

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

Service appeal No. 821/2020

Date of institution ... 04.02.2020

Date of decision .... 03.09.2020

Imtiaz Ali Librarian (BPS-17) Charsadda Public Library Charsadda.  
... (Appellant)

Versus

The Chief Secretary Government of Khyber Pakhtunkhwa and 04 others  
... (Respondents)

Present

Miss Naila Jan  
Advocate ... For appellant.

Mr. Riaz Khan Pinda Kheil,  
Assistant Advocate General ... For official respondents.

Mr. Amin ur Rehman Yousafzai  
Advocate ... For Private respondent #.5

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MRS. ROZINA REHMAN,  
MR. MIAN MUHAMMAD ... MEMBER(J).  
... MEMBER (E)

JUDGMENT

ROZINA REHMAN MEMBER (J):

Imtiaz Ali has filed the instant appeal U/S 4 of Khyber Pakhtunkhwa Service Tribunal Act, 1974 against the impugned notification dated 29.01.2020 whereby departmental appeal of respondent No.5 Mst. Shahla Tahir was accepted and appellant was transferred from Charsadda Public Library to Government Degree College Amakhel Tank.

2. Learned counsel for appellant contended that appellant was serving as Librarian at GDC Zarobi, Swabi when in the meanwhile he was transferred to Public Library Charsadda vide notification dated 06.08.2019. He hardly served for three and half month when he received his premature transfer order dated 17.12.2019 vide which he was transferred to GDC Pattan Kohistan. He, therefore, approached the competent authority and accordingly notification was withdrawn. The respondent No.5 filed departmental appeal against the said order and as a result, the appellant was transferred to GDC Amakhel Tank. He argued that the impugned order is premature and in utter violation of law, rules and regulations.

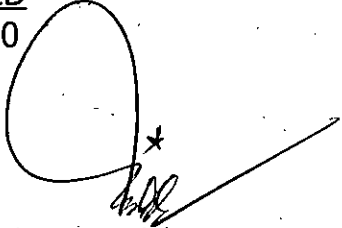
3. Conversely, learned AAG assisted by the learned counsel for respondent No.5, argued that appellant is serving in the Directorate of Higher Education Khyber Pakhtunkhwa and not in the Directorate of Archives and Libraries. Respondent No.5 being a regular employee of Directorate of Archives and Libraries was having a legal right to be posted in any Library including Public Library Charsadda. She belongs to Charsadda and she was, therefore, rightly posted in Public Library Charsadda. Notification dated 17.12.2019 was withdrawn however departmental appeal filed by respondent No.5 under Civil Servant Appeal Rules, 1986 was accepted and she was posted in Public Library Charsadda on merits. That the order is in accordance with law.

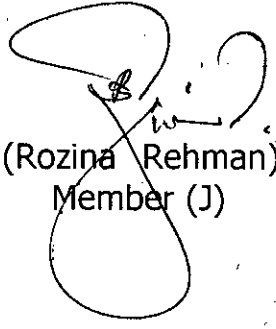
4. The kernel of the above discussion is that appellant was appointed as Teaching Assistant in the Higher Education Khyber Pakhtunkhwa on contract basis which was subsequently regularized as Lecturer vide notification dated 07.03.2018. Respondent No.5 Shahla

03/19/20

Tahir was appointed on the recommendation of Khyber Pakhtunkhwa Public Service Commission as Librarian in the Directorate of Archives and Libraries Khyber Pakhtunkhwa vide order dated 26.02.2008 and on the recommendation of Departmental Promotion Committee has been promoted to BPS-17 vide notification dated 29.03.2010. As per record, both appellant and respondent No.5 belong to different cadres i.e. Lecturer and Librarian respectively. Learned counsel for appellant has not been able to seek indulgence of this Tribunal, therefore, the request/prayer of appellant for his transfer as Librarian in the Archives and Libraries Department is not justified. In the light of above, this appeal is dismissed with no order as to costs. File be consigned to the record room.

ANNOUNCED  
03.09.2020

  
(Mian Muhammad)  
Member (E)

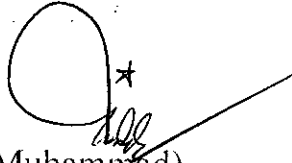
  
(Rozina Rehman)  
Member (J)

29.07.2020

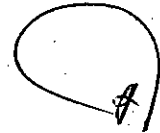
Appellant present in person.

Mr. Riaz Khan Paindakheil learned Assistant Advocate General for respondents present.

Due to lengthy arguments in a service appeal, order in the instant case could not be dictated. Moreover, few points need more clarification, therefore, the case is adjourned to 03.09.2020 before D.B.



(Mian Muhammad)  
Member (E)



(Rozina Rehman)  
Member (J)

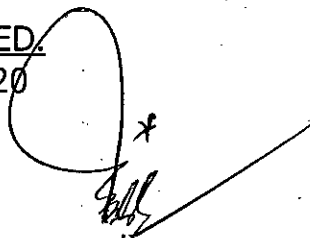
03.09.2020

Appellant present through counsel.

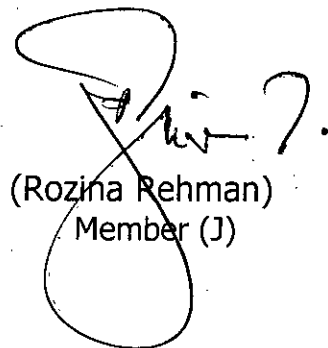
Mr. Riaz Khan Paindakheil learned Assistant Advocate General for official respondents present. Counsel for private respondent No.5 present.

Vide detailed judgment of today of this Tribunal placed on file, this instant appeal is dismissed with no order as to costs. File be consigned to the record room.

ANNOUNCED.  
03.09.2020



(Mian Muhammad)  
Member (E)



(Rozina Rehman)  
Member (J)


15.07.2020


Appellant in person present.

Mr. Muhammad Jan learned Deputy District Attorney for official respondents No.1 to 4 present. Husband of private respondent No.5 present.

Former requests for adjournment due to non-availability of his learned counsel.

Adjourned by way of last <sup>chance</sup> To come up for arguments on 20.07.2020 before D.B.

  
(Attiq ur Rehman)  
Member (E)

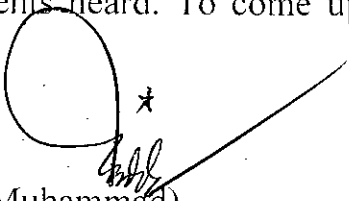
  
(Rozina Rehman)  
Member (J)

20.07.2020

Appellant with counsel present.

Mr. Riaz Khan Paindakheil learned Assistant Advocate General alongwith Atta ur Rehman Assistant for official respondents No. 1 to 4 present. Counsel for private respondent No.5 present.

Arguments heard. To come up for <sup>order on</sup> 29.07.2020 before D.B.

  
(Mian Muhammad)  
Member (E)

  
(Rozina Rehman)  
Member (J)

23.06.2020

Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 21.09.2020 before D.B.

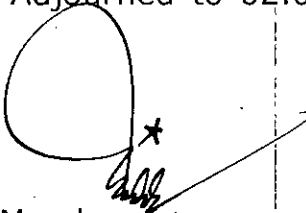
  
Reader

23.06.2020

Appellant in person and Mr. Riaz Paindakhel learned Asst. AG alongwith Mr. Muqarab Khan Section Officer for the respondents present.

The appellant requests for adjournment due to indisposition of his learned counsel.

Adjourned to 02.07.2020 for arguments before D.B.

  
Member

  
Chairman

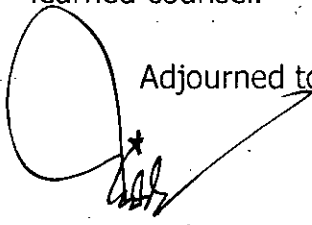
Service Appeal No.821/2020

02.07.2020

Appellant in person. Mr. Muhammad Jan learned DDA alongwith Mr. Atta Ur Rehman Assistant for respondent No. 1 to 4, counsel for private respondent No.5 present.

Former requests for adjournment due to indisposition of his learned counsel.

Adjourned to 15.07.2020 for arguments before D.B.

  
Member

  
Chairman

11.03.2020

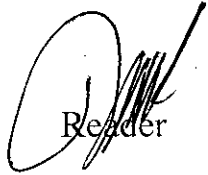
Appellant in person present. Mr. Zia Ullah learned Deputy District Attorney for official respondent present. Learned counsel for private respondent present and submitted reply. Learned counsel for private respondent contended that the appellant belongs to Teaching Cadre/Lecturer hence he is otherwise not entitled for the grant of relief as prayed for. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for further proceedings/arguments on 26.03.2020 before D.B.

  
Member

  
Member


26.03.2020


Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 15.06.2020 before D.B.

  
Reader

15.06.2020


Learned counsel for the appellant present. Mr. Riaz Khan Paindakheil learned Assistant Advocate General alongwith Kazi Ayaz Litigation Officer for official respondents present. Learned counsel for private respondent also present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 23.06.2020 before D.B. Restraint order shall be continued till the next date fixed.

  
(Rozina Rehman)  
Member

  
(M.Amin Khan Kundi)  
Member

26.02.2020

Appellant alongwith counsel present. Mr. Kabirullah Khattak, Addl. AG alongwith representative for official respondents present and submitted parawise comments alongwith an application for vacation of stay. Private respondent No. 5 in person present. Advocate Aminur Rahman Yousafzai has furnished Wakalatnama in favour of private respondent No. 5 alongwith an application for dismissal of appeal being not maintainable. To come up for arguments on application submitted by respondent No. 5 on 27.02.2020 before S.B-1.

  
(Hussain Shah)  
Member

27.02.2020

Appellant with counsel present. Learned counsel for private respondent No.5 present. Official respondents have already submitted their parawise comments. Learned counsel for private respondent No.5 seeks adjournment. In the instant service appeal, the appellant has made impugned posting transfer order. Moreover, interim relief has also been granted. As such the present service appeal is assigned to D.B. Adjourn. To come up for further proceedings/arguments on 11.03.2020 before D.B. Private respondent No.5 may submit reply/comments on the next date fixed before D.B.

  
Member



12.02.2020

Learned counsel for the appellant present. Preliminary arguments heard.

The appellant (Librarian) has filed the present service appeal being aggrieved against the posting transfer order dated 29.01.2020 whereby upon the acceptance of Departmental Appeal filed by the private respondent, the appellant was transferred from Charsadda Public Library Charsadda and posted at GDC Amakhel Tank.

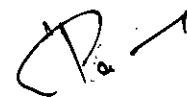
Learned counsel for the appellant contended inter-alia that the appellant was transferred prematurely on the basis of political motivation and victimization, upon the directives of Chief Minister.

Submission made by learned counsel for the appellant need consideration. The present service appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for reply/comments. To come up for written reply/comments on 26.02.2020 before S.B.

Annexed with the memo of appeal is an application for interim relief. Notice of the said application be also issued to the respondents for the date fixed. In the meanwhile operation of the impugned order dated 29.01.2020 is suspended till the next date fixed.

Appellant Deposited  
Security & Process Fee

12/2/20


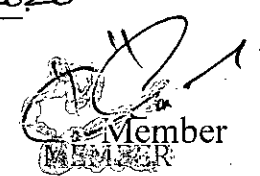


Member

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 821 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	04/02/2020	<p>The appeal of Mr. Imtiaz Ali today by Mr. Naila Jan Advocate may be entered in the Institution Register and put up to the Learned Member for proper order please. decrease</p> <p style="text-align: right;">                       REGISTRAR 04/2/2020                 </p>
2-	11/02/2020	<p>The case is entrusted to Snc Bench for preliminary hearing to be put up there on 12/02/2020</p> <p style="text-align: right;">                       Member                 </p>

**BEFORE THE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. 821 /2020

Imtiaz Ali Librarian (BPS-17) Charsadda Public Library  
Charsadda .....**Appellant**

**VERSUS**

Chief Secretary Government of Khyber Pakhtunkhwa &  
others

.....**Respondents**

**I N D E X**

<b>S.No</b>	<b>Description of Documents</b>	<b>Annex ure</b>	<b>Pages</b>
1.	Service Appeal		1-5
2.	Affidavit		6
3.	Addresses of Parties.		7
4.	Application for Suspension		8-9
5.	Affidavit		10
6.	Copy of the notification dated 06/08/2019	A	11
7.	Copy of the notification dated 17/12/2019	B	12
8.	Copy of the notification dated 18/12/2019	C	13
9.	Copy of the notification dated 29/01/2020	D	14
10.	Wakalat Nama		15

Through

  
Appellant

  
**Naila Jan**

Advocate, High court  
Peshawar

Date: 04-Feb-20

Khyber Pakhtunkhwa  
Service Tribunal

Case No. 984  
Date 04-02-2020

**BEFORE THE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. 821 /2020

Imtiaz Ali Librarian (BPS-17) Charsadda Public Library  
Charsadda

.....Appellant

**VERSUS**

1. The Chief Secretary Government of Khyber pakhtunkhwa
2. The Secretary Higher Education & Archives & Libraries Department Khyber pakhtunkhwa Peshawar
3. Director Archives and Libraries KP Peshawar
4. Director Higher Education Khyber Pakhtunkhwa Peshawar
5. Mst. Shahla Tahir Directorate of Archives and libraries KP Peshawar.

.....Respondents

Appeal U/S 4 of Khyber Pakhtunkhwa Service Tribunal Act, 1974, against the impugned appellant notification dated 29/01/2020 whereby departmental appeal of the respondent No. 5 was accepted and the appellant has been transferred illegally, prematurely and on the directions of Chief Minister, from Charsadda Public library Charsadda to

Filed to-day  
Registrar  
04/02/2020

**Government Degree college  
Amakhel Tank.**

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Prayer:-

*On acceptance of the service appeal, the impugned notification dated 29/01/2020, may kindly be set aside and the appellant may kindly be retain at his own place of posting i.e. Charsadda public library Charsadda.*

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**Respectfully Sheweth:-**

*Appellant submits as under:*

1. That the appellant is serving as librarian in the respondent department as librarian who was lastly posted as librarian at GDC Zarobi Swabi when the appellant was transferred vide notification dated 06/08/2019 from GDC Zarobi Swabi to Public Library Charsadda. **(Copy of the notification is attached as annexure A)**
2. That the appellant hardly served for three and a half months when the appellant received his pre-mature transfer notification dated 17/12/2019, whereby the appellant was transferred from Public Library

Charsadda to GDC Pattan Kohistan and respondent No. 5 being Blue eyed chip of was posted at his place.

**(Copy of the notification dated 17/12/2019 is attached as annexure B)**

3. That as the appellant is diabetic and his mother is ill on bed rest therefore the appellant approached respondents, and respondent were kind enough to withdraw the notification dated 17/12/2019 vide notification 18/12/2019. **(Copy of the notification dated 18/12/2019 is attached as annexure C)**

4. That respondent No. 5 feeling aggrieved from 18/12/2017 filed a departmental appeal against the notification dated 18/12/2019 which was accepted vide impugned notification dated 29/01/2020 purely on political bases as the same was the result of Chief Minister KP Directives which is evident from the impugned notification and the appellant was once again transferred from Charsadda Public Library to GDC Amakhel tank and respondent No. 5 was transferred and posted at Charsadda Public Library Charsadda. **(Copy of the notification dated 29/01/2020 is attached as annexure D)**

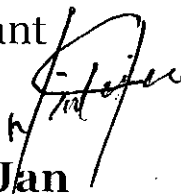
5. That feeling aggrieved from the impugned appellant notification the appellant having no other alternative remedy but to fill the instant appeal on the following ground inter alia:

**G R O U N D S :-**

- A. That the impugned notification is against law, rules and principle of natural justice hence void ab-initio.
- B. That the impugned notification is based on Directives of the Chief minister hence the same is based on political motivation and victimization hence on this ground along the same is liable to be set aside.
- C. That the appellant has been made rolling stone and subjected the frequent transferred posting prematurely hence the impugned notification is against the law and rules.
- D. That as per transfer posting policy the normal tenure of the civil servant is two years. However, the appellant has not been treated in accordance with that policy. Which amount to discrimination, hence Article 25 of the constitution of Islamic Republic of Pakistan, 1973 has been violated by the respondents.

- E. That the impugned notification is not in public interest but is in the interest of respondent No. 5, hence the impugned notification is based on favoritism, nepotism not sustainable in the eye of law.
- F. That the appellant is diabetic and his mother is ill on bed rest and there is no one to look after her, however in notification to victimize the appellant he was transferred to a far flung area which shows the mala-fidly of the respondents.
- G. That any other ground may be raised at the time of arguments, with the kind permission of this Honourable Tribunal.

**It is, therefore, most humbly prayed that on acceptance of the appeal the impugned notification dated 05/04/2019, 09/10/2019 and 18/10/2019 may kindly be set aside and the appellant may graciously be re-instated into service with all back benefits.**

Appellant  
Through 

**Naila Jan**  
Advocate, High court  
Peshawar

Date: 04-Feb-20



**BEFORE THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. \_\_\_\_\_/2020

Imtiaz Ali Librarian (BPS-17) Charsadda Public Library  
Charsadda .....**Appellant**

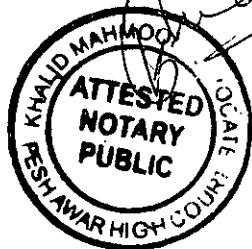
**VERSUS**

Chief Secretary Government of Khyber Pakhtunkhwa &  
others

.....**Respondents**

**AFFIDAVIT**

I, Imtiaz Ali Librarian (BPS-17) Charsadda Public Library Charsadda, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



*Imtiaz Ali*  
**DEPONENT**

**BEFORE THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. \_\_\_\_\_/2020

Imtiaz Ali Librarian (BPS-17) Charsadda Public Library  
Charsadda .....**Appellant**

**VERSUS**

Chief Secretary Government of Khyber Pakhtunkhwa &  
others

.....**Respondents**

**ADDRESSES OF PARTIES**

**APPELLANT**

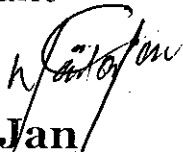
Imtiaz Ali Librarian (BPS-17) Charsadda Public Library  
Charsadda

**RESPONDENTS**

1. The Chief Secretary Government of Khyber  
pakhtunkhwa
2. The Secretary Higher Education & Archives &  
Libraries Department Khyber pakhtunkhwa  
Peshawar
3. Director Archives and Libraries KP Peshawar
4. Director Higher Education Khyber Pakhtunkhwa  
Peshawar
5. Mst. Shahla Tahir Directorate of Archives and  
libraries KP Peshawar.

  
Appellant

Through

  
**Naila Jan**  
Advocate, High court  
Peshawar

Date: 04-Feb-20

**BEFORE THE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. \_\_\_\_\_/2020

Imtiaz Ali Librarian (BPS-17) Charsadda Public Library  
 Charsadda .....**Appellant**

**VERSUS**

Chief Secretary Government of Khyber Pakhtunkhwa &  
 others

.....**Respondents**

**APPLICATION FOR SUSPENSION OF THE**  
**IMPUGNED NOTIFICATION DATED**  
**29/01/2020.**

**Respectfully Sheweth:**

1. That the above mention appeal is filing before this Hon'ble tribunal and no date is fixed yet.
2. That the impugned notification dated 29/01/2020 is pre-mature and political motivated therefore prima facia case, and balance of convenience is in favour of appellant/petitioner.
3. That the appellant has not yet relinquished the charge however if the impugned notification is not suspended the appellant will suffer irreparable loss.

4. That grounds of the main appeal may kindly be considered as integral part of this petition.

It is, therefore, most humbly prayed that on acceptance of this application, the impugned notification dated 29/01/2020 may kindly be suspended till the disposal of the service appeal.

*[Handwritten Signature]*  
Appellant

Through

*[Handwritten Signature]*  
**Naila Jan**  
Advocate, High court  
Peshawar

Date: 04-Feb-20

**BEFORE THE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. \_\_\_\_\_/2020

Imtiaz Ali Librarian (BPS-17) Charsadda Public Library  
Charsadda .....**Appellant**

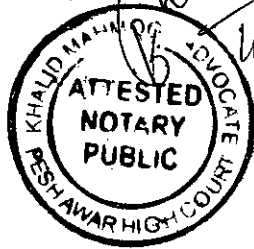
**VERSUS**

Chief Secretary Government of Khyber Pakhtunkhwa &  
others

.....**Respondents**

**AFFIDAVIT**

I, Imtiaz Ali Librarian (BPS-17) Charsadda Public Library Charsadda, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



*Imtiaz Ali*  
**DEPONENT**

11

Heated A<sup>u</sup>



**GOVERNMENT OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES AND  
LIBRARIES DEPARTMENT**

Dated Peshawar the, August 6, 2019.

**NOTIFICATION**

**No. SO (C-IV)/HED/ 1-6/ Imtiaz Ali/2019:-** The Competent Authority is pleased to transfer Mr. Imtiaz Ali, Librarian (BPS-17) Govt. Degree College Zarobi Swabi to Public Library Charsadda against the vacant post of Librarian (BPS-17) with immediate effect in the best public interest :-

Note:- No TA/DA is allowed.

**SECRETARY  
HIGHER EDUCATION DEPARTMENT**

**ENDST: NO. & DATE EVEN.**

Copy forwarded for information and further necessary action to:-

1. Director Archives & Libraries, Khyber Pakhtunkhwa.
2. Director Higher Education, Khyber Pakhtunkhwa.
3. District Account Officer Swabi.
4. District Account Officer Charsadda.
5. Principal Govt. Degree College Zarobi Swabi.
6. Incharge Public Library Charsadda.
7. PS to Secretary, Higher Education Department.
8. Officer concerned.
9. Master file.

*[Signature]*  
**SECTION OFFICER (C-IV)**

*[Signature]*  
**Attested**



12

**GOVERNMENT OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES, AND  
LIBRARIES DEPARTMENT**

*Handwritten initials 'B'*

Dated: 17th December 2019

**NOTIFICATION**

NO. SO (C-IV) HED/16/2019. The Competent authority is pleased to order the transfer of Mr. Shaukat Ahmad (BPS-17) from Directorate of Higher Education and Directorate of Archives & Libraries with immediate effect in the best public interest.

Name of Librarian	Present Station	Proposed Station	Remarks
Mr. Shaukat Ahmad	Charsadda Public Library, Charsadda	G.P.O. Pattan, Kohistan	V.V.P
Mr. Shaukat Ahmad	Directorate of Archives & Libraries, Peshawar	Charsadda Public Library, Charsadda	Vice & No. 1

Note: - No L.A. D.V is allowed.

**SECRETARY  
HIGHER EDUCATION DEPARTMENT**

**ENDS: NO. & DATE EVEN.**

Copy forwarded: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar
2. Director, Archives and Libraries, Khyber Pakhtunkhwa
3. Principal, Govt. Degree College Pattan, Kohistan
4. Deputy Director (H.M.S) Cell Higher Education Department
5. District Account Officer, Charsadda.
6. District Account Officer, Govt. Kohistan.
7. Incharge Public Library, Charsadda
8. PS to Secretary, Higher Education Department
9. Officers concerned.
10. Master file

*Handwritten signature*

*Handwritten signature*  
SECTION OFFICER (C-IV)

**GOVERNMENT OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES AND  
LIBRARIES DEPARTMENT**

Dated Peshawar the, **December 17, 2019**

**NOTIFICATION:**

**No. SO(C-IV)HED/1-6/2019.** the competent authority is pleased to order the transfer of the following librarians (BPS-17) in Directorate of Higher Education and Directorate of archives & Libraries with immediate effect at the best public interest.

S.No.	Name of Librarian	Present Station	Proposed Station	Remarks
3.	Mr. Imtiaz Ali	Charsadda Public Library, Charsadda	GDC Amakhel Tank	A.V.P
4.	Mst. Shahla Tahir	Directorate of Archives & Libraries, Khyber Pakhtunkhwa Peshawar	Charsadda Public Library Charsadda	Vice S. No. 1

Note NO TA/DA is allowed.

SECRETARY  
HIGHER EDUCATION DEPARTMENT

Endst: No. & Date even.

Copy forwarded:

11. Accountant General, Khyber Pakhtunkhwa, Peshawar
12. Director Archives and libraries, Khyber Pakhtunkhwa
13. Principal, Govt. Degree College Amakhel Tank
14. Deputy Director (HEMIS) Cell Higher Education Department
15. District Account officer, Charsadda
16. District Account Officer, Tank
17. Incharge Public Library Charsadda
18. PS to Secretary, higher Education Department.
19. Officers concerned
20. Master file.





13

Aur  
C

**GOVERNMENT OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES AND  
LIBRARIES DEPARTMENT**

Dated Peshawar the, **December 18, 2019.**

**NOTIFICATION**

**NO. SO(C-IV) HED/1-6/2019.** The Competent authority has been pleased to withdraw the Notification of even No. dated 17.12.2019 with immediate effect in the best public interest.

**SECRETARY  
HIGHER EDUCATION DEPARTMENT**

**ENDST: NO. & DATE EVEN.**

**Copy forwarded: -**

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director Archives and Libraries, Khyber Pakhtunkhwa.
3. Principal, Govt. Degree College Pattan, Kohistan.
4. Deputy Director (HEMIS) Cell Higher Education Department.
5. District Account Officer, Charsadda.
6. District Account Officer, Lower Kohistan.
7. Incharge Public Library, Charsadda.
8. PS to Secretary, Higher Education Department.
9. Officers concerned.
10. Master file.

*[Signature]*  
18/12/2019  
SECTION OFFICER (C-IV)

*[Signature]*  
Attested

**GOVERNMENT OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES AND  
LIBRARIES DEPARTMENT**

Dated Peshawar the, **December 18, 2019**

**NOTIFICATION:**

**No. SO(C-IV)HED/1-6/2019.** The competent authority is pleased to withdraw the notification of even No. dated 17~~7~~/12/2019 with immediate effect in the best public interest.

SECRETARY  
HIGHER EDUCATION DEPARTMENT

Endst: No. & Date even.

Copy forwarded:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar
2. Director Archives and libraries, Khyber Pakhtunkhwa
3. Principal, Govt. Degree College Amakhel Tank
4. Deputy Director (HEMIS) Cell Higher Education Department
5. District Account officer, Charsadda
6. District Account Officer, Tank
7. Incharge Public Library Charsadda
8. PS to Secretary, higher Education Department.
9. Officers concerned
10. Master file.

**Section Officer (C-IV)**



14

Hader  
2020

GOVERNMENT OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES AND  
LIBRARIES DEPARTMENT

Dated Peshawar the, January 29, 2020

**NOTIFICATION**

NO. SO(C-IV) HE.D/1-6/2019. In continuation of this department Notification of even number 18-12-2019, the appeal of the Mst. Shabla Lahir, Librarian (BPS-17), Directorate of Archives & Libraries, Khyber Pakhtunkhwa has been accepted in light of the Directives of Honorable Chief Minister Khyber Pakhtunkhwa and the Competent authority is pleased to order the transfer of the following Librarian (BPS-17) in Directorate of Higher Education and Directorate of Archives & Libraries with immediate effect in the public interest. -

Sr	Name of Librarian	Present Station	Proposed Station	Remarks
1	Mr. Imtiaz Ali	Charsadda Public Library, Charsadda	GDC Amakhel Tank	A.V.P
2	Mrs. Shabla Lahir	Directorate of Archives & Libraries, Khyber Pakhtunkhwa Peshawar	Charsadda Public Library, Charsadda	Vec S No.1

1. No F.A/DA is allowed.

SECRETARY  
HIGHER EDUCATION DEPARTMENT

**ENDS: NO. & DATE EVEN.**

Copy forwarded: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar
2. Director Archives and Libraries, Khyber Pakhtunkhwa.
3. Principal, Govt. Degree College Amakhel Tank.
4. Deputy Director (HE/MIS) Cell Higher Education Department.
5. District Account Officer, Charsadda.
6. District Account Officer, Tank
7. Incharge Public Library, Charsadda.
8. PS to Secretary, Higher Education Department
9. Officers concerned.
10. Master file

SECTION OFFICER (C-IV)

**GOVERNMENT OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES AND  
LIBRARIES DEPARTMENT**

Dated Peshawar the, **January 29, 2020**

**NOTIFICATION:**

**No. SO(C-IV)HED/1-6/2019.** in continuation of this department notification of even number dated 18.12.2019, the appeal of the Mst. Shahla Tahir, Librarian (BPS-17). Directorate of Archives & Libraries, Khyber Pakhtunkhwa has been accepted in light of the Directives of Hon'ble Chief Minister Khyber Pakhtunkhwa and the competent authority is pleased to order the transfer of the following Librarian (BPS-17) in Directorate of Higher Education and Directorate of Archives & libraries with immediate effect in the public interest:

S.No.	Name of Librarian	Present Station	Proposed Station	Remarks
1.	Mr. Imtiaz Ali	Charsadda Public Library, Charsadda	GDC Amakhel Tank	A.V.P
2.	Mst. Shahla Tahir	Directorate of Archives & Libraries, Khyber Pakhtunkhwa Peshawar	Charsadda Public Library Charsadda	Vice S. No. 1

Note NO TA/DA is allowed.




SECRETARY  
HIGHER EDUCATION DEPARTMENT

Endst: No. & Date even.

Copy forwarded:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar
2. Director Archives and libraries, Khyber Pakhtunkhwa
3. Principal, Govt. Degree College Amakhel Tank
4. Deputy Director (HEMIS) Cell Higher Education Department
5. District Account officer, Charsadda
6. District Account Officer, Tank
7. Incharge Public Library Charsadda
8. PS to Secretary, higher Education Department.
9. Officers concerned
10. Master file.

15

قیمت 50 روپے	26724			
ایڈوکیٹ: <u>Aida Jam</u>		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل/ایسوسی ایشن نمبر:				
رابطہ نمبر: <u>03129215471</u>				

بعدالت جناب: فہم سہیل سرگرمی

مخاطب: <u>اسعدانہ</u>	دعویٰ: <u>Service Appeal</u>
<u>اصحابِ عدلیہ</u>	علت نمبر:
<u>بنام</u>	مورخہ:
<u>حکومت</u>	جرم:
	تھانہ:

**باعث تحریر آئکہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام لشٹا کیلئے نا مل جال (منہج لعی) حاجہ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یک طرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 03/02/2020

الع گواہ شد الع  
مقام لشٹا کے لیے منظور ہے۔

اصحابِ عدلیہ  
(منہج لعی) حاجہ

نوٹ: اس وکالت نامہ کی فونڈ کاپی ناقابل قبول ہوگی۔

Accepted by Qasim

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. 821/2020

Imtiaz Ali, Librarian (BPS-17) Charsadda Public Library Charsadda

.....Applicant

**VERSUS**

The Chief Secretary Government of Khyber Pakhtunkhwa & Others

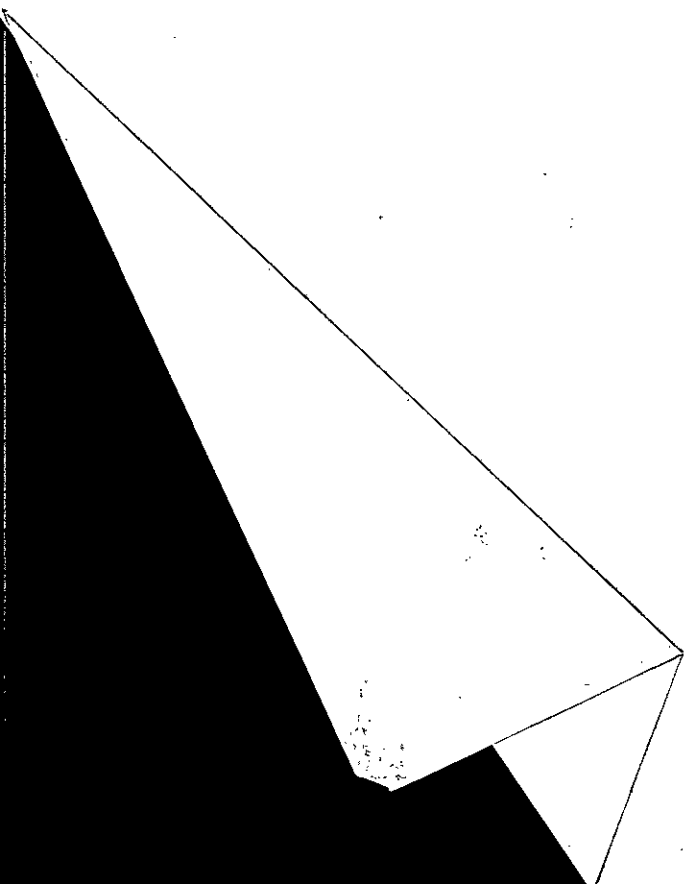
.....Respondents

**INDEX**

S No.	Description of Documents	Annexure	Pages
1.	Parawise Comments		1-3
2.	Affidavit		4

*Muzaffar Khan*

**Section Officer (Litigation)**  
Higher Education Department Khy  
Pakhtunkhwa Peshawar.



**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal No.821/2020

Imtiaz Ali, Librarian (BPS-17) Charsadda Public Library Charsadda

.....Appellant

VERSUS

The Chief Secretary Government of Khyber Pakhtunkhwa &amp; others

.....Respondents

**RESPECTFUL SHEWETH:-****PRELIMINARY OBJECTIONS: -**

1. That the instant service appeal filed U/S 4 of Khyber Pakhtunkhwa Service Tribunal Act, 1974 is absolutely non-maintainable. The appellant has not come to this Hon'able tribunal after exhausting departmental appeal, provided under the Civil Servant Appeal Rules 1986.

The appellant has bypassed the appellate authority. The appellant could only come to this Hon'ble Tribunal after laps of statutory period of 90 days after preferring departmental appeal to the departmental appellate authority. Therefore the appeal in hand is not only premature but also non maintainable.

2. This honorable tribunal, with due respect, lacks jurisdiction to entertain the instant appeal in hand. This tribunal is invested U/S 4 of the Service Tribunal Act to hear appeal of civil servants aggrieved with final orders. The appellant has not come to this tribunal from the final orders of departmental authorities. Therefore the instant service appeal is likely to be dismissed in limine.
3. The appellant has no cause of action nor locus standi to file the service appeal in this Honorable Service Tribunal.
4. The appellant has not come to this honorable tribunal with clean hands. He has concealed material facts from this honorable tribunal, disclosure whereof, may disentitle the appellant for the relief as prayed.

**PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 1 TO 4 ARE SUBMITTED AS UNDER: -****ON FACTS: -**

1. That the appellant is serving in the Directorate of Higher Education Khyber Pakhtunkhwa and not in the Directorate of Archives and Libraries Khyber Pakhtunkhwa. He was transferred and posted in Public Library Charsadda on 06.08.2019, a library



under the administrative control of the Director, Archives & Libraries, Khyber Pakhtunkhwa.

2. The respondent No.5 is a regular employee of the Directorate of Archives and Libraries Khyber Pakhtunkhwa. She has the legal right to be posted in any Library of the Directorate of Archives and Libraries Khyber Pakhtunkhwa including Public Library Charsadda. She belongs to Charsadda. All his family members live in Charsadda. She can only best deliver services in Public Library Charsadda, being domiciled therein. The competent authority has lawfully posted her in Public Library Charsadda vide order dated 17/12/2019, correctly annexed by the appellant with the memo of his service appeal. Thus her transfer posting was made by the Competent Authority on merit at Public Library Charsadda.
3. Correct that the transfer posting notification dated 17/12/2019 was withdrawn by the respondent No.2, however on acceptance of departmental appeal, preferred under the Civil Servants Appeal Rules 1986 read with section 22 of the Khyber Pakhtunkhwa Civil Servant Act 1973, the respondent No.5 was re-posted in Public Library Charsadda vide notification dated 29/01/2020 on merit. The Chief Minister is the Chief Executive of the province and he is under constitutional obligations to see that the laws of the country are adhered to in letter and spirit. Therefore the acceptance of the appeal of the appellant by the respondent No.2 on the directive of Chief Minister is in accordance with law. The Chief Minister is not only the political head of party but also the Chief Executive of the province. Therefore his directive to undo a wrong is completely in consonance with law.
4. Incorrect and misconceived as explained in the preceding para. The appellant is not aggrieved at all.
5. That the appellant is not aggrieved to file the instant service appeal in the honorable service tribunal.

**ON GROUNDS:-**

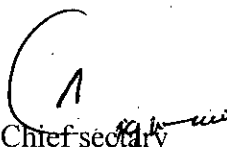
- A. Incorrect and misconceived. As explained in para-1, the appellant belongs to different cadre in the Directorate of Higher Education Khyber Pakhtunkhwa. He is governed on the Service Rules of the Directorate of Higher Education where his seniority is determined and venue of promotion are provided in his directorate. The honorable Supreme Court of Pakistan in its land mark judgment reported in 2013 SCMR 1752 has expounded the law that holder of a non cadre person, like the appellant cannot be posted against the cadre post. The same judgment has been conveyed to all the Chief Secretaries of all the provinces of Pakistan for compliance. Therefore the competent authority has

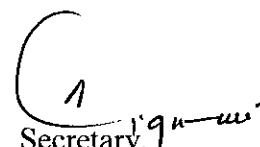
acted in accordance with law by posting the respondent No.5 at Public Library Charsadda.


- B. Incorrect and misconceived as explained above.
- C. Incorrect. The appellant is subjected to the law and constitution. He can be posted anywhere within the province or even outside the province U/S 10 of the Khyber Pakhtunkhwa Civil Servant Act, 1973. He cannot be posted according to his own choice. The appellant strives for posting of his choice and in the process subjected himself to a rolling stone for which he himself is to be blamed.
- D. Incorrect and misconceived. The appellant has been treated in accordance with law and constitution.
- E. Incorrect and misconceived. The respondent No.5 deserves to be posted in her own cadre. And the respondent No.2 accepted her appeal on merit and in accordance with law.
- F. Incorrect and misconceived as explained above.
- G. The respondent may also assist this honorable tribunal with other grounds not mentioned herein above.


**Prayer**

Thus in view of the above submission the instant service appeal may be dismissed in limine being devoid of merit with appropriate costs.

  
 Chief Secretary  
 Khyber Pakhtunkhwa  
 (Respondent No. 1)

  
 Secretary,  
 Higher Education Archives &  
 Library Department  
 (Respondent No. 2)

  
 Director  
 Archives & Libraries  
 Khyber Pakhtunkhwa  
 (Respondent No. 3)

  
 Director  
 Higher Education,  
 Khyber Pakhtunkhwa  
 (Respondent No. 4)

(4)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal No.821/2020

Imtiaz Ali, Librarian (BPS-17) Charsadda Public Library Charsadda

.....Appellant

VERSUS

The Chief Secretary Government of Khyber Pakhtunkhwa & others

.....Respondents

**AFFIDAVIT**

I, Muqarrab Khan, Section Officer (Litigation) Higher Education, Archives and Library Department do hereby solemnly as per instructions of the respondents declare on oath that the contents of the parwise comments are correct and true and nothing has been concealed therein from this honorable service tribunal.

Deponent



Muqarrab Khan,  
CNIC No.16101-4117211-5

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**

CM application No. /2020

IN

Service Appeal No.821/2020

Imtiaz Ali, Librarian (BPS-17) Charsadda Public Library Charsadda

.....Appellant

VERSUS

The Chief Secretary Government of Khyber Pakhtunkhwa & others

.....Respondents

**APPLICATION FOR VACATION OF STAY ORDER**

**DATED: 12/02/2020.**

**Respectful Sheweth:-**

1. That the subject service appeal is pending adjudicating before this honorable tribunal in which the date of hearing is fixed for 26/02/2020 before the honorable SB of this tribunal.
2. The respondents in pursuance of the order dated 12/02/2020 have filed comments in this tribunal which may be treated as integral part of this application.
3. This honorable tribunal has suspended the notification of transfer dated 29/01/2020.
4. That service appeal in hand is not likely to be accepted. The appellant has neither made a prima facie case, nor a balance of convenience tilts in his favor. The appellant is not likely to suffer irreparable loss. Rather the respondents have a prima facie case in their favor. And if the impugned order dated 12/02/2020 is not re-called the respondents may suffer irreparably.

Therefore, it is humbly prayed, that the interim order dated 12/02/2020 may be re-called in the public interest at the earliest in the interest of justice and fair play.

*vetted / subject to correction, if any,  
affidavit and approval*

*my name*  
Section Officer (Litigation)  
Higher Education Department

*57/ AAE,  
Charsadda  
24/2/2020* Through

*Agreed as above.*  
*[Signature]*  
Additional Advocate General  
Khyber Pakhtunkhwa  
Service Tribunal Peshawar

District Attorney, Khyber

Pakhtunkhwa Service Tribunal, Peshawar

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal No.821/2020

Intiaz Ali, Librarian (BPS-17) Charsadda Public Library Charsadda

.....Appellant

VERSUS

The Chief Secretary Government of Khyber Pakhtunkhwa & others

.....Respondents

**AFFIDAVIT**

I, Muqarrab Khan, Section Officer (Litigation) Higher Education Department do hereby solemnly affirm and declare on oath that the contents of this application are correct and true and nothing has been concealed therein from this honorable service tribunal.

*Deponent*

Section Officer (Litigation)  
Higher Education Archives  
& Library Department  
Khyber Pakhtunkhwa.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal No.821/2020

Imtiaz Ali, Librarian (BPS-17) Charsadda Public Library Charsadda

.....Appellant

VERSUS

The Chief Secretary Government of Khyber Pakhtunkhwa & others

.....Respondents

**REPLY TO APPLICATION FOR SUSPENSION OF THE NOTIFICATION**

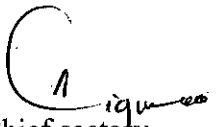
**DATED: 29/01/2020.**

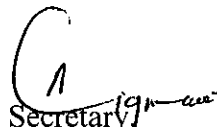
**Respectful Sheweth:-**


**Preliminary objections**

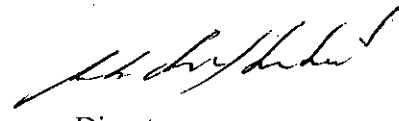
**ON FACTS**

1. That the instant service appeal is fixed for hearing on 26/02/2020.
2. Incorrect and misconceived. The appeal is non maintainable and premature. The notification dated 29/01/2020 passed in favor of respondent No.5 in accordance with law and rules made there under.
3. Incorrect the appellant is not likely to suffer irreparable loss.
4. The comments filed by the respondents in the subject service appeal may be considered as integral part of the reply of the respondents. Therefore it is humbly prayed that the application being devoid of merit may be dismissed with appropriate cost.

  
Chief secretary  
Khyber Pakhtunkhwa  
(Respondent No. 1)

  
Secretary  
Higher Education Archives &  
Library Department  
(Respondent No. 2)

  
Director  
Archives & Libraries  
Khyber Pakhtunkhwa  
(Respondent No. 3)

  
Director  
Higher Education,  
Khyber Pakhtunkhwa  
(Respondent No. 4)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal No.821/2020

Imtiaz Ali, Librarian (BPS-17) Charsadda Public Library Charsadda

.....Appellant

VERSUS

The Chief Secretary Government of Khyber Pakhtunkhwa& others

.....Respondents

**AFFIDAVIT**

I, Muqarrab Khan, Section Officer (Litigation) Higher Education Department do hereby solemnly affirm and declare on oath that the contents of this application are correct and true and nothing has been concealed therein from this honorable service tribunal.



Section Officer (Litigation)  
Higher Education Archives  
& Library Department  
Khyber Pakhtunkhwa.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,**  
**PESHAWAR**

Civil Misc. No. \_\_\_\_\_ of 2020

IN

Service Appeal No.821 of 2020

Imtiaz Ali Librarian. . . . . Versus. . . . Chief Secretary, Govt of KP & 4 others

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3.	Order dated: 12.02.2020	B	3-4
4.	Wakalatnama		5

*Shahla Talib*  
Applicant / Appellant

Through

Amin ur Rehman Yusufzai 

Sajjad Mehsud 

&

  
**Khalid Khan**

Advocates, Peshawar,  
3-A, Park Avenue, Bhattani Plaza,  
University Town, Peshawar

Cell No.0321-9022964, 0333-9981464

Dated: 26.02.2020



**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,**  
**PESHAWAR**

Civil Misc. No. \_\_\_\_\_ of 2020

IN

Service Appeal No.821 of 2020

Imtiaz Ali Librarian. . . . . Versus. . . . Chief Secretary, Govt of KP & 4 others

**APPLICATION FOR AND ON BEHALF OF RESPONDENT NO.5  
FOR RE-VISITING ORDER DATED: 12.02.2020 OF THIS HON'BLE  
TRIBUNAL AND DISMISSAL OF THE TITLED APPEAL BEING NOT  
MAINTAINABLE.**

**Respected Sir:**

1. That the titled appeal is pending adjudication before this Hon'ble Tribunal and fixed today i.e. 26.02.2020, for onward proceedings.
2. That appellant did not assail the impugned notification dated: 29.01.2020 before the appellate authority, within the meaning of Khyber Pakhtunkhwa Civil Servants (Appeal) Rules, 1986, which is mandatory pre-requisite for invoking jurisdiction of this Hon'ble Tribunal, under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, therefore, the titled appeal is not maintainable. Needless to add that, in view of the above legal position, order dated: 12.02.2020 of this Hon'ble Tribunal deserves to be re-visited.  
**(Copies of Notification dated: 29.01.2020 & order dated: 12.02.2020 of this Hon'ble Tribunal alongwith memo of appeal No.821/2020 are attached as Annexures "A" & "B" respectively).**
3. That any other ground, with the permission of this Hon'ble Tribunal, will be taken at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of instant application, order dated: 12.02.2020 of this Hon'ble Tribunal may be re-visited and the titled appeal may be dismissed being not maintainable, so as to secure the ends of justice.

*Shahla Talis*  
Applicant / Appellant

**AFFIDAVIT**

I do hereby solemnly affirm declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and that nothing has been kept concealed from this Hon'ble Court.

Through

*Amin ur Rehman Yusufza*

*Sajjad Mehsud*

*Khalid Khan*  
Advocates, Peshawar,  
3-A, Park Avenue, Bhattani Plaza,  
University Town, Peshawar  
Cell No.0321-9022964, 0333-9981464

*Shahla Talis &*  
Deponent

26 FEB 2020

ATTESTED



Dated: 26.02.2020



**GOVERNMENT OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES AND  
LIBRARIES DEPARTMENT**

Dated Peshawar the, **January 29, 2020.**

**NOTIFICATION**

**NO. SO(C-IV) HED/1-6/2019.** In continuation of this department Notification of even number dated 18-12-2019, the appeal of the Mst. Shahla Tahir, Librarian (BPS-17), Directorate of Archives & Libraries, Khyber Pakhtunkhwa has been accepted in light of the Directives of Hon'ble Chief Minister Khyber Pakhtunkhwa and the Competent authority is pleased to order the transfer of the following Librarians (BPS-17) in Directorate of Higher Education and Directorate of Archives & Libraries with immediate effect in the public interest: -

S#	Name of Librarian	Present Station	Proposed Station	Remarks
1.	Mr. Imtiaz Ali	Charsadda Public Library, Charsadda	GDC Amakhel Tank	A.V. P
2.	Mst. Shahla Tahir	Directorate of Archives & Libraries, Khyber Pakhtunkhwa, Peshawar	Charsadda Public Library, Charsadda	Vice S.No.1

Note: - **No TA/ DA is allowed.**

**SECRETARY  
HIGHER EDUCATION DEPARTMENT**

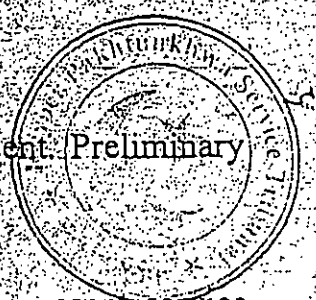
**ENDST: NO. & DATE EVEN.**

**Copy forwarded: -**

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director Archives and Libraries, Khyber Pakhtunkhwa.
3. Principal, Govt. Degree College Amakhel Tank.
4. Deputy Director (HEMIS) Cell Higher Education Department.
5. District Account Officer, Charsadda.
6. District Account Officer, Tank
7. Incharge Public Library, Charsadda
8. PS to Secretary, Higher Education Department.
9. Officers concerned.
10. Master file.

**SECTION OFFICER (C-IV)**

Appeal No. 821/2020  
Imtiaz Ali B. Govt



12.02.2020

Learned counsel for the appellant present. Preliminary arguments heard.

The appellant (Librarian) has filed the present service appeal being aggrieved against the posting transfer order dated 29.01.2020 whereby upon the acceptance of Departmental Appeal filed by the private respondent, the appellant was transferred from Charsadda Public Library Charsadda and posted at GDC Amakhel Tank.

Learned counsel for the appellant contended inter-alia that the appellant was transferred prematurely on the basis of political motivation and victimization, upon the directives of Chief Minister.

Submission made by learned counsel for the appellant need consideration. The present service appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for reply/comments. To come up for written reply/comments on 26.02.2020 before S.B.

Annexed with the memo of appeal is an application for interim relief. Notice of the said application be also issued to the respondents for the date fixed. In the meanwhile operation of the impugned order dated 29.01.2020 is suspended till the next date fixed.

*(Signature)*

Member

Certified to be true copy  
Khalid Iqbal  
Service Tribunal  
Peshawar

Date of Presentation of Application 13-2-2020  
Number of Words 800  
Copying Fee 10-00  
Urgent —  
Total 10-00  
Name of Copyist [Signature]  
Date of Completion of Copy 13-2-2020  
Date of Delivery of Copy 13-2-2020

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**

Case No. 984

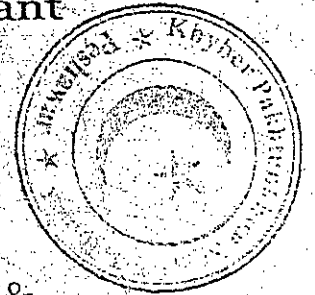
Date 04-02-2020

Service Appeal No. 821 /2020

Imtiaz Ali Librarian (BPS-17) Charsadda Public Library  
Charsadda

.....Appellant

**VERSUS**



1. The Chief Secretary Government of Khyber pakhtunkhwa
2. The Secretary Higher Education & Archives & Libraries Department Khyber pakhtunkhwa Peshawar
3. Director Archives and Libraries KP Peshawar
4. Director Higher Education Khyber Pakhtunkhwa Peshawar
5. Mst. Shahla Tahir Directorate of Archives and libraries KP Peshawar.

.....Respondents

Appeal U/S 4 of Khyber Pakhtunkhwa Service Tribunal Act, 1974, against the impugned appellant notification dated 29/01/2020 whereby departmental appeal of the respondent No. 5 was accepted and the appellant has been transferred illegally, prematurely and on the directions of Chief Minister, from Charsadda Public library Charsadda to

Filed to day  
*[Signature]*  
Registrar  
04/02/2020

Certified to be true copy  
*[Signature]*  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

## وکالت نامہ

بعدالت

سرور شریعتی فیاض خان لشار

استیاز علی بنام صف سکرٹری عدالت

منجانب ریٹائرڈ منسٹر عدالت دعویٰ اجرم سرور اسٹیل

تھانہ ایف آئی آر تاریخ

### باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی بمقام لیتا فیاض خان لشار نے  
امین الرحمن یوسفزئی ایڈووکیٹ ہائی کورٹ فیڈرل شریعت کورٹ آف پاکستان اینڈ سجاد احمد محسود ایڈووکیٹ ہائی کورٹ

کو بدین شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گا اگر پیشی پر من مظہر حاضر نہ ہوں اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے کسی اور جگہ یا کچہری کے مقررہ اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ اگر مقدمہ علاوہ صدر مقام کچہری کے کسی اور جگہ سماعت ہونے یا بروز تعطیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے پر من مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پرداختہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجرائے ڈگری و نظر ثانی اپیل و نگرانی ہر قسم کی درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجرا کرانے اور ہر قسم کا رویہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور پیردہائی درامی نامہ کو فیصلہ برخلاف کرنے، اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا مقررہ درخواست حکم انتہائی یا ترقی یا گرفتاری قبل از اجراء ڈگری یا اس کے کسی جزو کی کاروائی کے واسطے یا بصورت اپیل، ایپل کے واسطے کسی دوسرے وکیل یا پیرسٹر کو بجائے اپنے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو ہر امر میں وہی اور ویسے ہی اختیارات حاصل ہوں گے۔ جیسے کہ صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا۔ وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا یہ مختار نامہ لکھ دیا کہ سند ہے مورخہ 2020-02-26 مضمون مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

ATTESTED & ACCEPTED

Amin ur Rehman Yusufzai  
Advocate High Court  
&  
Federal Shariat Court of Pakistan  
CNIC: 17301-5813582-3  
Cell No. 0321-9022964  
BC-10-7562

Sajjad Ahmad Mehsud  
Advocate High Court  
Peshawar

Adv. Khalid Khan Mehsud  
Be-10118

Shahzad

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR**

In Re:

Service Appeal No. 821 of 2020

Intiaz Ali

**VERSUS**

Chief Secretary & others

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*Shahla Tabir*

Respondent No.5

Through

**Amin ur Rehman Yusufzai**

&

*Sajjad*  
**Sajjad Mehsud**

Advocates, Peshawar,  
3-A, Park Avenue, Bhattani Plaza,  
University Town, Peshawar  
Cell No.0321-9022964, 0333-9981464

Dated: 02.03.2020

①

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR**

In Re:

Service Appeal No. 821 of 2020

Imtiaz Ali

**VERSUS**

Chief Secretary & others

**REPLY FOR AND BEHALF OF RESPONDENT NO.5/ MST. SHAHLA TAHIR**

**Respectfully Sheweth:**

**TRUE FACTS OF THE CASE:**

1. Appellant was appointed as Teaching Assistant, in the Higher Education Department Khyber Pakhtunkhwa, on contract basis, in-between 03.10.2014 to 02.12.2015 and was subsequently regularized in service, as Lecturer (BS-17) in Library Science, Government Degree College Batkhela, Malakand, vide Notification dated: 07.03.2018, issued in pursuance of section 3 of the KP Teaching Assistant (Regularization of Services) Act, 2017.  
**(Copy of Notification dated: 07.03.2018 is attached as Annexure "A").**
2. That the answering Respondent was appointed by the competent authority, on the recommendations of Khyber Pakhtunkhwa Public Service Commission, as Librarian (BS-16), vide Office Order dated: 26.02.2008, in the Directorate of Archives & Libraries Khyber Pakhtunkhwa Peshawar and, on the recommendations of Departmental Promotion Committee, has been promoted to BS-17, vide notification dated: 29.03.2010.  
**(Copies of office order dated: 26.02.2008 & notification dated: 29.03.2010, are attached as Annexures "B" & "C" respectively).**
3. That it is note-worthy that seniority of appellant is reckoning with the rest of the lecturers in BPS-17, of the High Education Department Khyber Pakhtunkhwa while seniority of the answering Respondent has been reckoned with Librarians, Directorate of Archives & Libraries, Khyber Pakhtunkhwa. Though seniority list of the Librarians, Directorate of Higher Education Department, Khyber Pakhtunkhwa, do exists but, in view of case of the appellant, his name is not reflecting from both the seniority lists of Librarians, either issued by the Directorate of Higher Education Department, Khyber Pakhtunkhwa, vide notification dated: 30.08.2018, or issued by the Directorate of Archives & Libraries Khyber Pakhtunkhwa. Needless to add that name of the answering Respondent is reflecting from the seniority list, at Serial No.8, issued by the Directorate of Archives & Libraries, Khyber Pakhtunkhwa.  
**(Copies of seniority lists dated: 30.08.2018 (of the Higher Education Department Khyber Pakhtunkhwa) & 20.11.2017 (issued by the Directorate of Archives & Libraries Khyber Pakhtunkhwa) are Annexures "D" & "E" respectively).**
4. That, admittedly, appellant and the answering respondent belongs to different cadres i.e. Lecturer and Librarian respectively, therefore, respective cadres of each of them are prohibited for one another, hence prayer of appellant for transfer as Librarian in the Archives & Library Department Khyber Pakhtunkhwa is not only illegal but also not acceptable to prudent mind.

**PRELIMINARY OBJECTIONS:**

1. That this Hon'ble Tribunal, with great respect, has no jurisdiction to entertain the titled appeal in its present form.
2. That appellant did not assail Notification dated: 29.01.2020 before the appellate authority, within the meaning of Khyber Pakhtunkhwa Civil Servants (Appeal) Rules, 1986, being mandatory pre-requisite for invoking jurisdiction of this Hon'ble Tribunal Under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, therefore, the titled appeal is not maintainable.
3. That appellant is the employee of Higher Education Department and answerable to Director Higher Education, under the Khyber Pakhtunkhwa Government Rules of Business, 1985, while the answering Respondent No.5 is the employee of Archives & Libraries Department and answerable to Director Archives & Libraries, therefore, post in the Archives & Libraries Department is non cadre for the appellant, hence he could neither be transferred against non-cadre post nor he can approach, either to the appellate authority or this Hon'ble Tribunal, for the said purpose.
4. That the appellant has neither cause of action nor locus standi to file the titled appeal before this Hon'ble Tribunal.
5. That the appellant has not come to this Hon'ble Tribunal with clean hands. Furthermore, he has concealed material facts from this Hon'ble Tribunal, which disentitle the appellant for the relief prayed for.

**ON FACTS:**

1. Para No.1 is correct to the extent that appellant was transferred from Government Degree College Zarobi, Swabi, vide Notification dated: 06.08.2019, to Public Library Charsadda, however, he deliberately suppressed the fact with regard to his basic appointment in the Directorate of Higher Education, Khyber Pakhtunkhwa, while Public Library Charsadda is functioning under the Directorate of Archives & Libraries Khyber Pakhtunkhwa, which is non-cadre for the appellant, hence he could neither be transferred to the Directorate of Archives & Libraries nor he can approach this Hon'ble Tribunal for the desired relief.
2. Para No.2 is misleading, hence denied, moreover, transfer notification dated: 06.08.2019 supra of appellant has been given effect and he remained posted in Public Library Charsadda, till subsequent notification dated: 17.12.2019, vide which he has been transferred to his own Directorate i.e. Higher Education Department, and the answering Respondent has been transferred to the Public Library Charsadda against the post vacated by the appellant.
3. Para No.3 is misleading as laid, hence denied, moreover, appellant is highly influential person and managed to withdraw notification dated: 17.12.2019 supra on the very next day i.e. 18.12.2019, evident from notification dated: 18.12.2019, Annexed at "C" in the titled petition.



4. Para No.4 is correct to the extent that the answering Respondent assailed notification dated: 18.12.2019 supra through departmental appeal dated: 20.12.2019, which was considered at appropriate level and the competent authority issued notification dated: 29.01.2019, vide which services of appellant have been transferred back to his own directorate and posted in GDC Amma Khel Tank, while the answering Respondent has been transferred to Public Library Charsadda. Needless to add that allegations of appellant with regard to use of political influence on the part of answering Respondent is misconceived, hence denied. **(Copy of departmental appeal dated: 20.12.2019 is attached as Annexure "F")**.
5. That para No.5 is misleading, hence denied, furthermore, the alternate remedy in shape of departmental appeal within the meaning of Khyber Pakhtunkhwa Civil Servants (Appeal) Rules, 1986, has escaped sight of the appellant, hence he has wrongly invoked jurisdiction of this Hon'ble Tribunal, which deserves to be rejected.

**ON GROUNDS:**

- A. Incorrect as laid, hence denied. Moreover notification dated: 29.01.2020 is in accordance with law and may not be interfered with.
- B. Incorrect as laid, hence denied. Moreover, neither Notification dated: 29.01.2020 has been issued by the incompetent authority, nor the answering respondent has ever approached to the authority, other than mentioned in the law/rules governing the subject. It is worth to mention that transfer/posting of appellant in the Archives & Libraries Department is otherwise illegal, therefore, if at all, any directive of the Chief Executive of the Province do exist on the subject, the same would have been issued for streamlining the affairs of the Provincial Government Departments, in light of the directives, rendered in numerous Judgments by this Hon'ble Tribunal, for recalling such like orders, evident from Judgment/ Order dated: 09.08.2019 of this Hon'ble Tribunal in Service Appeal No.823/2019. **(Copy of Judgment / Order dated: 09.08.2019 of this Hon'ble Tribunal is attached as Annexure "G")**.
- C. Misleading as laid, hence denied. Moreover, it is clearer than crystal from the facts and circumstances of the case that appellant is trying to be paid premium of his foul play, evident from his repeated transfers against non-cadre posts, which speaks volumes of malafide on his part.
- D. Misleading as laid, hence denied. Moreover, the transfer / posting policy, as well as fundamental rights guaranteed under the Constitution of Islamic Republic of Pakistan, 1973, could only be invoked in cases of legitimate transfers, while case of the appellant is glaring example of repeated violations of law/rules governing the subject, hence such like practice deserves to be discouraged.
- E. Misleading as laid, hence denied. Moreover, notification dated: 29.01.2020 is in accordance with law and issued by the competent authority, strictly in accordance with law/rules governing the subject.

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F. Misleading to the extent of victimization of appellant, hence denied, so far as the illness of his mother and his own health condition is concerned, he may bitterly approached the competent authority for his posting / transfer in his own cadre and not at the cost of the answering respondent.

G. Pertains to the sole discretion of this Hon'ble Tribunal, hence need no reply.

It is, therefore, most humbly prayed that on acceptance of instant Reply, the title appeal may be dismissed with heavy cast throughout.

*Shahla Tahir*

Respondent No.5

Through

**Amin ur Rehman Yusufzai**

&

*Sajjad*

**Sajjad Mehsud**

Advocates, Peshawar,  
3-A, Park Avenue, Bhattani Plaza,  
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Cell No.0321-9022964, 0333-9981464

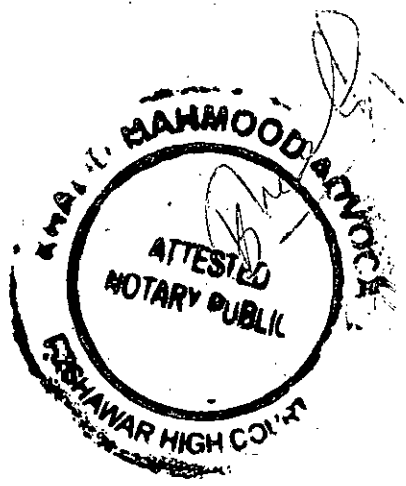
Dated: 02.03.2020

**VERIFICATION:**

Verified on oath today on 2<sup>nd</sup> day of March, 2020, that the contents of instant **Reply** are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Court.

*Shahla Tahir*

Deponent



5

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR**

In Re:

Service Appeal No. 821 of 2020

Imtiaz Ali

**VERSUS**

Chief Secretary & others

**REPLICATION OF THE APPLICATION FOR SUSPENSION OF THE  
NOTIFICATION DATED: 29.01.2020**

**Respectfully Sheweth:**

1. Needs no reply.
2. Misconceived as laid, hence denied. Moreover, notification dated: 29.01.2020 has been issued by the competent authority in accordance with law/rules governing the subject.
3. Misleading as laid, hence denied. Moreover, neither the appellant has cause of action nor locus standi to file the titled appeal, therefore, sustaining irreparable loss by him, is out of question rather imagination.
4. The facts and grounds of the accompanying reply of the answering respondent may be as integral part and parcel of instant application.

It is, therefore, most humbly prayed that on acceptance of instant replication, application of appellant for suspension of the notification dated: 29.01.2020 may be rejected, in the best interest of justice and equity.

*Shahla Palir*

Respondent No.5

Through

*Amin ur Rehman Yusufzai*

&

*Sajjad*

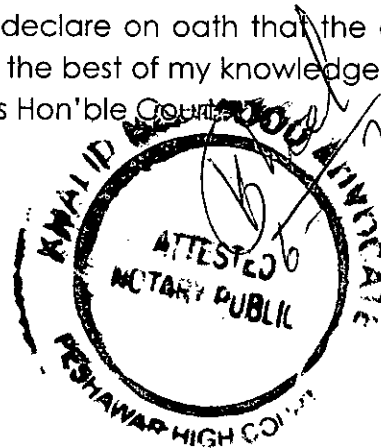
**Sajjad Mehsud**

Advocates, Peshawar,  
3-A, Park Avenue, Bhattani Plaza,  
University Town, Peshawar  
Cell No.0321-9022964, 0333-9981464

Dated: 02.03.2020

**AFFIDAVIT**

I, do hereby solemnly affirm declare on oath that the contents of the instant **Application** are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Court.



*Shahla Palir*  
Deponent



GOVT. OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES &  
LIBRARIES DEPARTMENT

Dated Peshawar the March 07, 2018.

**NOTIFICATION**

**NO. SO(C-II)HED/2-5/2018.** In pursuance of Section 3 of the Khyber Pakhtunkhwa Teaching Assistant (Regularization of Services) Act, 2017, the Competent Authority is pleased to regularize the services of the following Teaching Assistants, appointed from 31.10.2014 till 02.12.2015 and holding the same posts till commencement of the aforementioned Act, as lecturer (BS-17), w.e.f. 25.10.2017, subject to the terms and conditions mentioned hereunder:-

S.N.	NAME & STATION.	POSTED AS	REMARKS
1.	Muhammad Riaz S/O Wali Muhammad, TA in Islamiyat GC, Peshawar	Lecturer in Islamiyat, GC, Peshawar	AVP
2.	Fayaz Khan S/O Hawas Khan TA in Geography, GC, Peshawar	Lecturer in Geography, GC, Peshawar	AVP
3.	Muhammad Abid Qazi S/O Muhammad Tahir Qazi, TA in Computer Science, GC, Peshawar	Lecturer in Computer Science GC, Peshawar	AVP
4.	Ahmad Farooq S/O Anwar Khan, TA in English GC, Peshawar	Lecturer in English GC, Peshawar	AVP
5.	Muhammad Mohsin kamal S/O Muhammad Shahid Kamal, TA in Maths. GC, Peshawar	Lecturer in Maths GC, Peshawar	AVP
6.	Haroon Rasheed S/O Muhammad Khan, TA in Physics GC, Peshawar	Lecturer in Physics GDC, No. 1 D.I. Khan	AVP
7.	Muhammad Hashim S/O Muhammad, TA in Urdu, GC, Peshawar	Lecturer in Urdu GC, Peshawar	AVP
8.	Muhammad Iqbal S/O Ameer Gul, TA in Botany, GC, Peshawar	Lecturer in Botany GC, Peshawar	AVP
9.	Inam Ullah S/O Muhammad Iqbal TA in Zoology, GC, Peshawar	Lecturer in Zoology GC, Peshawar	AVP
10.	Akhtar Alam S/O Zar Muhammad TA in Computer Science GDC, Mathra, Peshawar	Lecturer in Computer Science GDC, Mathra, Peshawar	AVP
11.	Sulaiman Khan S/O Muhammad Jar, TA in Physics GDC, Mathra, Peshawar	Lecturer in Physics GC, Peshawar	AVP
12.	Zikriya S/O Nazar Muhammad TA in Pak Study GDC, Wadpaga, Peshawar	Lecturer in Pak Study GDC, Achini Payan, Peshawar	AVP
13.	Muhammad Shah Nawaz S/O Muhammad Ilyas TA in Statistics GSSC, Peshawar	Lecturer in Statistics GSSC, Peshawar	AVP
14.	Umar Farooq S/O Zakir ul din TA in Physics GSSC, Peshawar	Lecturer in Physics GSSC, Peshawar	AVP
15.	Mussawar Shah S/O Hassan Shah TA in Economics GSSC, Peshawar	Lecturer in Economics GSSC, Peshawar	AVP

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16.	Asif Khan S/O Gul Muhammad TA in Law, GSSC, Peshawar	Lecturer in Law GSSC, Peshawar	AVP
17.	Faizul Hassan S/O Inayat Ullah Siddiqi, TA in Zoology GSSC, Peshawar	Lecturer in Zoology GSSC, Peshawar	AVP
18.	Hashim ur Rehman S/O Saeed ur Rehman, TA in Maths GSSC, Peshawar	Lecturer in Maths GSSC, Peshawar	AVP
19.	Mir Ahmad Shah S/O Syed Ahmad Shah, TA in Urdu GDC, Chagharmatti, Peshawar	Lecturer in Urdu GDC, Badaber Peshawar	AVP
20.	Muhammad Saqib S/O Jan Muhammad, TA in Political Science, GDC, Chagharmatti, Peshawar.	Lecturer in Political Science GDC, Chagharmatti, Peshawar	AVP
21.	Abbas Khan S/O Almas Khan TA in English GDC, Badaber, Peshawar	Lecturer in English GDC, Badaber, Peshawar	AVP
22.	Miraj Ud Din S/O Shokat Ali TA in Chemistry GDC, Badaber, Peshawar	Lecturer in Chemistry GDC, Badaber, Peshawar	AVP
23.	Abdul Kafeel Shah S/O Mubarak Shah TA in English GDC, Naguman, Peshawar	Lecturer in English GC, Peshawar	AVP
24.	Farhan Ullah S/O Amir Sher TA in Political Science GDC, Naguman, Peshawar	Lecturer in Political Science GC, Peshawar	AVP
25.	Muhammad Adeel S/O Muhanimad Ferdos Khan, TA in Political Science, GPGC, No.1 Abbottabad	Lecturer in Pol: Science GPGC, No.1 Abbottabad	AVP
26.	Mustajab Ahmad S/O Matiur Rehman, TA in Botany, GPGC, No.1 Abbottabad	Lecturer in Botany GPGC, No.1 Abbottabad	AVP
27.	Umar Farooq S/O Saeed Ahmad TA in Mathematics, GPGC, No.1 Abbottabad	Lecturer in Maths GPGC, No.1 Abbottabad	AVP
28.	Muhammad Naveed S/O Muhammad Rafique, TA in Mathematics, GPGC, No.1 Abbottabad	Lecturer in Maths GPGC, No.1 Abbottabad	AVP
29.	Abid Mehmood S/O Mehboob Ilahi, TA in Chemistry, GPGC, No.1 Abbottabad	Lecturer in Chemistry GPGC, No.1 Abbottabad	AVP
30.	Rafaqat Hussain S/O Muhammad Yousaf, TA in Chemistry, GPGC, No.1 Abbottabad	Lecturer in Chemistry GPGC, No.1 Abbottabad	AVP
31.	Sadaqat Hussain S/O Muhammad Sarfaraz, TA in English, GPGC, No.1 Abbottabad	Lecturer in English GPGC, No.1 Abbottabad	AVP
32.	Muhammad Sharif S/O Muhammad Mumtaz, TA in Urdu GPGC, No.1 Abbottabad	Lecturer in Urdu GPGC, No.1 Abbottabad	AVP
33.	Syed Guftar Hussain Shah S/O Sakhi Amanat Shah, TA in Statistics, GPGC, No.1 Abbottabad	Lecturer in Statistics GPGC, No.1 Abbottabad	AVP
34.	Aftab Ahmad Khan S/O Aziz Ur Rehman, TA in Botany, GPGC, No.1 Abbottabad	Lecturer in Botany GPGC, No.1 Abbottabad	AVP

35.	Waqas Ahmad S/O Naik Muhammad , TA in Computer Science GPGC,Mandian,Abbottabad	Lecturer in Computer Science GPGC,Mandian,Abbott abad	AVP
36.	Ibrar Hussain S/O Muhammad Dildar. Khan, TA in Computer Science,GPGC,Mandian,Abbottabad	Lecturer in Computer Science GPGC,Mandian,Abbott abad	AVP
37.	Muhammad Faisal S/O Muhammad Irshad, TA in Maths GDC,Havelian,Abbottabad	Lecturer in Maths GDC,Havelian,Abbotta bad	AVP
38.	Ijlal Hussain S/O Javed Hussain TA in Maths, GDC,Sherwan,Abbottabad	Lecturer in Maths GDC,Sherwan,Abbotta bad	AVP
39.	Muhammad Asim S/O Hafiz Gul Muhammad ,TA in Chemistry GPGC,,Nowshera	Lecturer in Chemistry GPGC,Nowshera	AVP
40.	Touseef Ahmad S/O Litaf Gul TA in Chemistry, GPGC,Nowshera	Lecturer in Chemistry GPGC,Nowshera	AVP
41.	Hamid Hussain S/O Rahim Gul TA in Computer Science, GPGC,Nowshera	Lecturer in Computer Science GDC,PabbiNowshera	AVP
42.	Muhammad Atif S/O Sharif Ullah TA in English,GPGC,Nowshera	Lecturer in English GPGC,Nowshera	AVP
43.	Muhammad Mukhtar S/O Saif ur Rehman, TA in English, GPGC,Nowshera	Lecturer in English GPGC,Nowshera	AVP
44.	Sadiq Nawaz S/O Raz Muhammad TA in English, GPGC,Nowshera	Lecturer in English GPGC,Nowshera	AVP
45.	Ubaid Ur Rehman S/O Abdul Hamid, TA in Economics, GPGC,Nowshera	Lecturer in Economics GC, Peshawar.	AVP
46.	Hafiz Raza Muhammad S/O Haji Niaz Ali Khan, TA in Islamic Studies,GPGC,Nowshera	Lecturer in Islamic Studies GPGC,Nowshera	AVP
47.	Luqman S/O Gulzar Muhammad TA in Maths, GPGC,Nowshera	Lecturer in Maths GPGC,Nowshera	AVP
48.	Waqas S/O Muhammad Ghufraan TA in Maths, GPGC,Nowshera	Lecturer in Maths GC,Peshawar	AVP
49.	Majid Shehzad S/O Ghulam Muhammad, TA in Physics, GPGC,Nowshera	Lecturer in Phycis GPGC,Nowshera	AVP
50.	Asad Ali S/O Ghafar Khan, TA in Physics,GPGC,Nowshera	Lecturer in Physics GPGC,Nowshera	AVP
51.	Atiq Alam S/O Dalil Khan, TA in Computer Science, GDC,Pabbi,Nowshera	Lecturer in Computer Science, GPGC,Nowshera	AVP
52.	Samad Hayat S/O Jafar Khan, TA in English,GDC,Pabbi,Nowshera	Lecturer in English GDC,Pabbi,Nowshera	AVP
53.	Sameer Ullah S/O Ilyas Khan, TA in Islamiyat, GDC,Pabbi,Nowshera	Lecturer in Islamiyat GDC,Pabbi,Nowshera	AVP
54.	Muhammad Zeb S/O Bakhtiar ,TA in political Science, GDC,Pabbi,Nowshera	Lecturer in Political Science GDC,Pabbi,Nowshera	AVP
55.	Muhammad Iqbal S/O Shaukat Ali TA in History Cum Civics, GDC,Khan kohi,Nowshera	Lecturer in History- cum-Civics GDC,Khan kohi,Nowshera	AVP
56.	Fida Hussain S/O Usman Uddin, TA in Physics, GDC,Khan kohi,Nowshera	Lecturer in Physics GDC,Khan kohi,Nowshera	AVP

*[Handwritten signature]*

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59.	Ijaz Ali S/O Shoukat Ali, TA in Chemistry GDC, Agra, Malakand	Lecturer in Chemistry, GDC, Agra, Malakand	AVP
60.	Abid S/O Mueen Ul Haq, TA in Physics, GDC, Agra, Malakand	Lecturer in Physics, GDC, Agra, Malakand	AVP
61.	Shehzad Haider S/O Sher Haider, TA in Computer Science, GDC, Palai, Malakand	Lecturer in Computer Science, GDC, Palai, Malakand	AVP
62.	Naveed Khan S/O Bazir Khan, TA in Economics, GDC, Palai, Malakand	Lecturer in Economics, GDC, Badraga	AVP
63.	Muhammad Humayun Khan S/O Sahib Razaq, TA in Islamiyat, GDC, Palai, Malakand	Lecturer in Islamiyat, GDC, Palai, Malakand	AVP
64.	Akbar Ali S/O Noor Rehman, TA in Botany, GDC, Palai, Malakand	Lecturer in Botany, GDC, Palai, Malakand	AVP
65.	Muzammil Shah S/O Mehmood Shah, TA in Pak Study, GDC, Palai, Malakand	Lecturer in Pak Studies, GDC, Palai, Malakand	AVP
66.	Zahoor Alam S/O Amir Alam, TA in Urdu, GDC, Palai, Malakand	Lecturer in Urdu, GDC, Palai, Malakand	AVP
67. ✓	Imtiaz Ali S/O Badam Gul, TA in Lib, Science, GDC, Batkhela, Malakand	Lecturer in Lib Science, GDC, Batkhela, Malakand	AVP
68.	Akhtar Hussain S/O Parwanat Khan, TA in Islamiyat, GDC, Batkhela, Malakand	Lecturer in Islamiyat, GDC, Mingora	AVP
69.	Muhammad Ayaz S/O Sharif Gul, TA in Chemistry, GDC, Batkhela, Malakand	Lecturer in Chemistry, GDC, Badraga	AVP
70.	Muhammad Nawab S/O Mohammad Hilal, TA in Economics GDC, Batkhela, Malakand	Lecturer in Economics, GDC, Batkhela, Malakand	AVP
71.	Farman Ullah Shah S/O Fazli Rehman, TA in Botany, GDC, Batkhela, Malakand	Lecturer in Botany, GDC, Batkhela, Malakand	AVP
72.	Farman Ali S/O Mohammad Quresh, TA in Statistics, GDC, Batkhela, Malakand	Lecturer in Statistics, GDC, Batkhela, Malakand	AVP
73.	Ahmad S/O Majeed Gul, TA in Islamiyat, GDC, Thana, Malakand	Lecturer in Islamiyat, GDC, Thana Malakand	AVP
74.	Janat Gul S/O Rehman Gul, TA in English, GDC, Thana, Malakand	Lecturer in English, GDC, Mingora	AVP
75.	Muhammad Shoaib S/O Mohin Gul, TA in Zoology, GDC, Thana, Malakand	Lecturer in Zoology, GDC, Mingora	AVP
76.	Muhammad Ayaz S/O Mohammad Nabi, TA in Mathematics, GDC, Thana, Malakand	Lecturer in Maths GDC, Thana Malakand	AVP
77.	Zafar Ali S/O Lajbar Khan TA in HPE, GDC, Thana, Malakand	Lecturer in HPE GDC, Thana Malakand	AVP
78.	Shakeel Arshad S/O Talimand Khan, TA in English, GDC, Totakan, Malakand	Lecturer in English, GDC, Gulababad DIR Lower	AVP
79.	Nadeem Ullah S/O Shakirullah, TA in Urdu, GPGC, Mardan	Lecturer in Urdu GDC Takhtbhai, Mardan	AVP

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81.	Naqeeb S/O Muhammad Alam, TA in Maths, GPGC, Mardan	Lecturer in Maths GPGC, Mardan	AVP
82.	Usman Ali Khan S/O Muhammad Askar Khan, TA in Statistics GPGC, Mardan	Lecturer in Statistics GPGC, Mardan	AVP
83.	Shah Hussain S/O Fazali Ghafoor, TA in Physics, GPGC, Mardan	Lecturer in Physics, GPGC, Mardan	AVP
84.	Syed Ahmad Shah S/O Mubarak Shah, TA in Physics, GPGC, Mardan	Lecturer in Physics, GPGC, Mardan	AVP
85.	Himayat Ullah S/O Imran Uddin, TA in Chemistry GPGC, Mardan	Lecturer in Chemistry GDC, Lund Khwar (Mardan)	AVP
86.	Shahab Khan S/O Abdur Rauf Khan, TA in Computer Science GPGC, Mardan	Lecturer in Computer Science, GPGC, Swabi	AVP
87.	Amjad Ali S/O Sher Muhammad, TA in Sociology, GPGC, Mardan	Lecturer in Sociology, GPGC, Mardan	AVP
88.	Pervez Khan S/O Fazal Gul, TA in Maths, GPGC, Mardan	Lecturer in Maths, GDC, No.2 Mardan	AVP
89.	Sulaiman Shah S/O Painsa Shah, TA in Islamiyat, GPGC, Mardan	Lecturer in Islamiyat, GPGC, Mardan	AVP
90.	Muhammad Zahir S/O Saif ul Malook, TA in Urdu, GPGC, Mardan	Lecturer in Urdu, GPGC, HARIPUR	AVP
91.	Muhammad Tufail S/O Sher Ali TA in English GDC, Babuzai, Mardan	Lecturer in English, GDC, Daggar	AVP
92.	Muhammad Sajid S/O Muhammad Israr, TA in Urdu GDC, Babuzai, Mardan	Lecturer in Urdu, GPGC, Haripur	AVP
93.	Muhammad Rameez S/O Muhammad Shakeel, TA in Economics GDC, Babuzai, Mardan	Lecturer in Economics, GPGC, Haripur	AVP
94.	Abdus Samad S/O Wazeer Zada, TA in Maths GDC, Babuzai, Mardan	Lecturer in Maths, Govt Abdul Ali Khan Degree College, Charsadda	AVP
95.	Hamid ul Haq S/O Muhammad Anwar, TA in Zoology GDC, Lund Khwar, Mardan	Lecturer in Zoology, GDC, Lund Khwar Mardan	AVP
96.	Robi Alam S/O Mir Alam, TA in Urdu GDC, Lund Khwar, Mardan	Lecturer in Urdu, GDC, Lund Khwar, Mardan	AVP
97.	Mujahid S/O Khiyal Bahadar, TA in Physics GDC, Lund Khwar, Mardan	Lecturer in Physics, GDC, Lund Khwar	AVP
98.	Syed Qayum Shah S/O Musharraf shah, TA in Urdu GDC, Bakhshali, Mardan	Lecturer in Urdu, GDC, Ghazi (Haripur)	AVP
99.	Rafeeq Hassan S/O Amir Hassan, TA in English GDC, Bakhshali, Mardan	Lecturer in English, GDC, Tangi, Charsadda	AVP
100.	Amjad Khan S/O Yaqoob Khan, TA in Physics, GDC, Bakhshali, Mardan	Lecturer in Physics GDC, Ghazi (Haripur)	AVP
101.	Mr. Naveed Alam S/O Mir Alam Khan, TA in Statistics GDC, No.2, Mardan	Lecturer in Statistics, GDC, No.2 Mardan	AVP
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105.	Mr. H. Mir Alam Khan S/O Nazeer Gul, TA in Biology, GDC, Khairabad, Mardan	Lecturer in Biology, GPGC, Mardan	AVP
106.	Mr. Amjad Khan S/O Muneer Khan, TA in Urdu, GDC, Khairabad, Mardan	Lecturer in Urdu GDC, No.2 Mardan	AVP
107.	Mr. Kashif Muhammad S/O Sheda Muhammad, TA in English, GDC, Katlang, Mardan	Lecturer in English, GDC, Katlang, Mardan	AVP
108.	Mr. Faiz Muhammad S/O Kamin Khan, TA in Pak. Studies GDC, Katlang, Mardan	Lecturer in Pak: Studies GDC, Katlang, Mardan	AVP
109.	Mr. Aziz Ullah Khan S/O Fareed Gul, TA in Political Science, GDC, Katlang, Mardan	Lecturer in Pol: Science GDC, Katlang, Mardan	AVP
110.	Mr. Jehangir Khan S/O Sher Zamani, TA in Pashto, GDC, Toru, Mardan	Lecturer in Pashto GDC, Toru, Mardan	AVP
111.	Mr. Inayat Khan S/O Nowsher Khan, TA in Physics, GDC, Toru, Mardan	Lecturer in Physics GDC, Toru, Mardan	AVP
112.	Mr. Imtiaz Ahmad S/O Mian Gul TA in English, GDC, Toru, Mardan	Lecturer in English GDC, Toru, Mardan	AVP
113.	Mr. Amir Badshah S/O Muhammad Yaqoob, TA in HPEGDC, Toru, Mardan	Lecturer in HPE GDC, Toru, Mardan	AVP
114.	Mr. Masood Shah S/O Hashmat Khan, TA in Urdu, GDC, Takht Bhai, Mardan	Lecturer in Urdu GDC, Takht Bhai, Mardan	AVP
115.	Mr. Sajjad Ali S/O Bahader Khan, TA in Geography, GDC, Ghari, Kapoora, Mardan	Lecturer in Geography, GDC, Takht Bhai, Mardan	AVP
116.	Waseem Ullah S/O Lal Shah Sherazi, TA in Pak Study, GPGC, Karak	Lecturer in Pak: Studies GPGC, Karak	AVP
117.	Muhammad Yasir Khan S/O Khursheed Sultan, TA in Economics, GPGC, Karak	Lecturer in Economics GPGC, Karak	AVP
118.	Tahir Zaman S/O Khalil ur Rehman, TA in Maths, GPGC, Karak	Lecturer in Maths GPGC, Karak	AVP
119.	Habib Nawaz S/O Haq Nawaz, TA in Maths, GPGC, Karak	Lecturer in Maths GPGC, Karak	AVP
120.	Zain Ullah S/O Noor Zarif khan, TA in Botany GPGC, Karak	Lecturer in Botany GPGC, Haripur	AVP
121.	Altaf Ullah Jan S/O Attaullah Jan TA in Political Science GPGC, Karak	Lecturer in Pol: Science GDC, Banda Daud Shah.	AVP
122.	Shahid Naveed S/O Saddiq Ullah TA in English, GDC, Sabir-Abad Karak	Lecturer in English GDC, Hangu	AVP
123.	Hamid Ul Aziz S/O Hadeat ul Aziz TA in Islamiyat, GDC, Sabir Abad Karak	Lecturer in Islamiyat GDC, Sabir Abad Karak	AVP
124.	Ashiq Muhammad S/O Asil Muhammad, TA in HPE, GDC, Sabir Abad Karak	Lecturer in HPE GDC, Sabir Abad Karak	AVP

125.	Ubaid Ullah S/O Mukhtiar Khan, TA in Chemistry, GDC, Sabir Abad Karak	Lecturer in Chemistry GDC, Sabir Abad Karak	AVP
126.	Kamran Shah S/O Dolat Amir TA in English, GDC Latambar Karak	Lecturer in English GDC Latambar Karak	AVP
127.	Abdul Wahab S/O Shahbaz khan, TA in Islamiyat, GDC Ahmad Abad Karak	Lecturer in Islamiyat GDC Latamber, Karak	AVP
128.	Habib Ullah S/O Sarbiland Khan, TA in Pak. Studies, GDC Ahmad Abad Karak	Lecturer in Pak: Studies GDC, Ahmad Abad, Karak	AVP
129.	Taseer Ullah S/O Shahbaz Noor, TA in History Cum Civics GDC Ahmad Abad Karak	Lecturer in History-cum-Civics, GPGC, Kohat	AVP
130.	Misbah Ullah S/O Abdul Razaq, TA in English, GDC, Takhte Nasrati Karak	Lecturer in English, GDC, Takhte Nasrati Karak	AVP
131.	Mujceeb Ullah Shayan S/O Noor Haleem, TA in English, GDC, BD shah Karak	Lecturer in English GDC, Tank	AVP
132.	Attiq UR Rehman S/O Muhammad Dost, TA in English, GDC, Chitral	Lecturer in English GDC, Chitral	AVP
133.	Khalid Zafar S/O Muhammad Zafar Shah, TA in English, GDC, Chitral	Lecturer in English GDC, Chitral	AVP
134.	Riaz Ahmad khan S/O Mir Swat khan, TA in Geography GDC, Chitral	Lecturer in Geography GDC, Chitral	AVP
135.	Fazal e Mansoor S/O Muhammad Rahim Khan, TA in Statistics, GDC, Chitral	Lecturer in Statistics GDC, Chitral	AVP
136.	Javed Ahmad S/O Mehrab Hussain TA in Physics, GDC, Chitral	Lecturer in Physics, GDC, Chitral	AVP
137.	Masood Ahmad S/O Shah Nawaz TA in Law, GDC, Booni Chitral	Lecturer in Law, GDC, Chitral	AVP
138.	Jamsheed Sarwar S/O Ghulam Sarwar, TA in Biology, GDC, Booni Chitral	Lecturer in Biology GDC, Dir Upper	AVP
139.	Aftab Saeed S/O Saeed Ur Rehman, TA in Computer Science, GDC, Chitral	Lecturer in Computer Science GDC, Wari, Dir Upper	AVP
140.	Mr. Naseer Muhammad S/O, Raees. khan, TA in English, GPGC, Lakki Marwat	Lecturer in English GPGC, Lakki Marwat	AVP
141.	Mr. Abdul Muneer Khan S/O Abdul Ghafoor khan, TA in Chemistry, GPGC, Lakki Marwat	Lecturer in Chemistry GPGC, Lakki Marwat	AVP
142.	Mr. Waheed Ullah S/O Ajmal Khan, TA in Statistics GPGC, Lakki Marwat	Lecturer in Statistics GPGC, Lakki Marwat	AVP
143.	Mr. Muhammad Arif Amin S/O Muhammad Amin Khan, TA in Zoology, GPGC, Lakki Marwat	Lecturer in Zoology GPGC, Lakki Marwat	AVP
144.	Mr. Abdul Qudus S/O Akbar Azam TA in Physics, GPGC, Lakki Marwat	Lecturer in Physics GDC, Essa Khel (Lakki Marwat)	AVP
145.	Mr. Muhammad Pervez Khan S/O Abul Rahim, TA in Computer Science, GDC, Ghazni, Khel, Lakki, Marwat	Lecturer in Computer Science, GDC, Ghazni Khel Lakki Marwat	AVP
146.	Mr. Mehboob Shah S/O Syed Akbar, TA in Statistics, GDC, Serai, Naurang	Lecturer in Statistics, GDC, Shah Esa Bilot Sharif (D.I. Khan)	AVP

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149.	Mr. Tahir Zaman S/O Gul Zaman, TA in Economics, GDC, Tajori, Lakki, Marwat	Lecturer in Economics GDC, Essa Khel (Lakki Marwat)	AVP
150.	Mr. Wajid Mehmood S/O Ghulam Habib, TA in HPE GDC, Tajori Lakki Marwat	Lecturer in HPE GDC, Tajori Lakki Marwat	AVP
151.	Mr. Muhammad Ismail S/O Gul Wali, TA in Chemistry GDCTajoriLakkiMarwat	Lecturer in Chemistry GDC, Essa Khel (Lakki Marwat)	AVP
152.	Mr. Ali Hussain S/O Usman Ghani, TA in Urdu, GDC, Tajori Lakki Marwat	Lecturer in Urdu GDC, Essa Khel (Lakki Marwat)	AVP
153.	Mr. Mursaleen Shah S/O Syed Badshah, TA in Botany GDC, Tajori Lakki Marwat	Lecturer in Botany GPGC, Lakki Marwat	AVP
154.	Mr. Rehman Ullah S/O Muhammad Azam, TA in Computer Science, GDC, Tajori Lakki Marwat	Lecturer in Computer Science, GPGC, Lakki Marwat	AVP
155.	Mr. Azmat Ali S/O Maqsood Ali, TA in Political Science GPGC, Charsadda	Lecturer in Pol: Science GPGC, Charsadda	AVP
156.	Wasim Farid S/O Muhammad Farid TA in English GPGC Charsadda	Lecturer in English GDC, Ghazi, Haripur	AVP
157.	Mr. Abid Jan S/O Roohul Amin, TA in Islamiyat, GPGC, Charsadda	Lecturer in Islamiyat GPGC, Charsadda	AVP
158.	Mr. Tariq Ali S/O Muhammad Ali TA in Arabic, GPGC, Charsadda	Lecturer in Arabic GPGC, Charsadda	AVP
159.	Mr. Noor Ullah Jan S/O Said Rehman, TA in Urdu, GPGC, Charsadda	Lecturer in Urdu GPGC, Charsadda	AVP
160.	Mr. Masood Jan S/O Nawab Khan TA in Pak Study GPGC, Charsadda	Lecturer in Pak: Studies GPGC, Charsadda	AVP
161.	Mr. Adnan Ahmad S/O Irshad Ahmad, TA in Political Science, GPGC, Charsadda	Lecturer in Political Science, GPGC, Charsadda	AVP
162.	Mr. Jan Alam S/O Muhammad Islam, TA in Computer Science, GPGC, Charsadda	Lecturer in Computer Science, GPGC, Charsadda	AVP
163.	Mr. Israr Ahmad Khan S/O Ahmad Khan, TA in Electronics GPGC, Charsadda	Lecturer in Electronics, GPGC, Charsadda	AVP
164.	Mr. Ahmad Yar S/O Mukhtiar Ali, TA in Yar Zoology GPGC, Charsadda	Lecturer in Zoology, GPGC, Charsadda	AVP
165.	Mr. Muhammad Zahoor S/O Muhammad Ismail, TA in Economics GPGC, Charsadda	Lecturer in Economics, GPGC, Charsadda	AVP
166.	Mr. Ahmad Jan S/O Muhammad Alam, TA in Physics, GDC, Abdul Ali Khan Utmanzai, Charsadda	Lecturer in Physics GDC, Abdul Ali Khan Utmanzai, Charsadda	AVP
167.	Mr. Hashim Khan S/O Mir Alam Khan, TA in Economics, GDC, Abdul Ali Khan Utmanzai, Charsadda	Lecturer in Economics GDC, Abdul Ali Khan Utmanzai, Charsadda	AVP
168.	Muhammad Arif S/O Muhammad Riaz Khan TA in Maths, GDC, Tangi Charsadda	Lecturer in Maths GPGC, Charsadda	AVP
169.	Muhammad Ayaz S/O Abdul Ahad, TA in Pashto GDC, Tangi Charsadda	Lecturer in Pashto GPGC, Charsadda	AVP

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170.	Gul Zamin S/O Gul Ameer, TA in Pashto GDC, TangiCharsadda	Lecturer in Pashto GPGC, Charsadda	AVP
171.	Gohar Zaman S/O Hameed Khan, TA in Political Science, GDC, TangiCharsadda	Lecturer in Political Science, GDC, Tangi, Charsadda	AVP
172.	Khair Ullah S/O Taimur Khan, TA in Economics, GDC, TangiCharsadda	Lecturer in Economics, GDC, Abdul Ali Khan Utmanzai, Charsadda	AVP
173.	Abid Jan S/O Gul Ghafoor, TA in Chemistry GDC, Tangi, Charsadda	Lecturer in Chemistry, GDC, Abdul Ali Khan Utmanzai, Charsadda	AVP
174.	Israr Ullah S/O Khan Zadin, TA in Physics, GDC, Tangi, Charsadda	Lecturer in Physics GDC, Abdul Ali Khan Utmanzai, Charsadda	AVP
175.	Lajbar Khan S/O Khan Wali, TA in Urdu, GDC, Shabqadar	Lecturer in Urdu GDC, Aehini, Peshawar	AVP
176.	Javed Iqbal S/O Taj Muhammad, TA in Chemistry GDC, Shabqadar	Lecturer in Chemistry GDC, Shabqadar	AVP
177.	Waqar Ahmad S/O Sayyar Khan, TA in Geography GDC, Shabqadar	Lecturer in Geography GPGC, Charsadda	AVP
178.	Khizar Hayat S/O Rehman Gul, TA in History cum Civics, GDC, Shabqadar	Lecturer in History-cum-Civics, GPGC, Charsadda	AVP
179.	Shahid Ullah S/O Saeed Ullah TA in Physics, GDC, Shabqadar	Lecturer in Physics, GDC, Shabqadar	AVP
180.	Waqar Nawaz S/O Alam Nawaz Khan, TA in Urdu, GDC, Shabqadar	Lecturer in Urdu GPGC, Charsadda	AVP
181.	Sufaid Khan S/O Sher Alam, TA in Chemistry, GPGC, Swabi	Lecturer in Chemistry GPGC, Swabi	AVP
182.	Sadam Hussain S/O Habib Gul, TA in Electronics, GPGC, Swabi	Lecturer in Electronics GPGC, Swabi	AVP
183.	Ramzan Hassan S/O Hussain Quresh, TA in Physics, GPGC, Swabi	Lecturer in Physics GPGC, Swabi	AVP
184.	Asif Iqbal S/O Biland Iqbal, TA in Sociology, GPGC, Swabi	Lecturer in Sociology GPGC, Swabi	AVP
185.	Ishaq Ali Shah S/O Mumtaz Ali Shah TA in Botany, GPGC, Swabi	Lecturer in Botany, GPGC, Swabi	AVP
186.	Altaf Ahmad Khan S/O Munawar Khan, TA in English, GPGC, Swabi	Lecturer in English, GPGC, Swabi	AVP
187.	Tahir Ali S/O Gul Zada, TA in English GDC, Lahor	Lecturer in English GPGC, Swabi	AVP
188.	Syed Mushtaq Ali Shah S/O Syed Ali Shah, TA in Computer Science, GDC, Lahor	Lecturer in Computer Science, GPGC, Swabi	AVP
189.	Said Arab S/O Amin Ullah Khan TA in Statistics, GDC, Lahor	Lecturer in Statistics, GPGC, Swabi	AVP
190.	Munsif Aman S/O Malak Aman, TA in Pak Study, GDC, Lahor	Lecturer in Pak: Studies GDC, Lahor	AVP
191.	Hassan Ali S/O Faiz Rasan, TA in Maths, GDC, Zarobi	Lecturer in Maths, GPGC, Swabi	AVP
192.	Rashid Khan S/O Abdul Akbar, TA in Chemistry, GDC, Zarobi	Lecturer in Chemistry, GDC, Zarobi	AVP
193.	Arshad Khan S/O Ghafoor Khan, TA in History cum civics, GDC, Gandaf	Lecturer in History-cum-Civics, GPGC, Swabi	AVP
194.	Umar Ali S/O Farid Khan, TA in Chemistry, GDC, Gandaf	Lecturer in Chemistry, GDC, Daggar	AVP
195.	Habib ur Rehman S/O Khalil Ur Rehman, TA in English, GDC, Gandaf	Lecturer in English, GDC, Yar Hussain	AVP

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196.	Jehan Afsar S/O Muhabbat Shah, TA in Economics, GDC, Gandaf	Lecturer inEconemics, GPGC,Swabi	AVP
197.	Muhammad Ishaq S/O Abdul Hassan TA in Pak Study, GDC, Gandaf	Lecturer inPak: Studies GDC, Gandaf	AVP
198.	Ahmad Ali S/O Hamdi Allah, TA in Islamiyat, GDC, Gandaf	Lecturer inIslamiyat, GPGC,Swabi	AVP
199.	Saim S/O Abdul Wadood, TA in Zoology, GDC, Kotha	Lecturer inZoology, GPGC,Swabi	AVP
200.	Jansher Khan S/O Jamshed Khan, TA in Economics, GDC, Kotha	Lecturer inEconomics, GDC, Kotha	AVP
201.	Yasir Ahmad S/O Muhammad Ikram, TA in English, GDC, Kotha	Lecturer inEnglish GDC, Totalai, Buner	AVP
202.	Fazal Dayan S/O Fazal Rehman, TA in Botany, GDC, Kotha	Lecturer inBotany, GDC Khamapur, Dir Lower	AVP
203.	Muhammad Idrees S/O Aziz ur Rehman, TA in English GDC, Zaida	Lecturer inEnglish, GPGC,Swabi	AVP
204.	Muhammad Farooq, S/OFarish Khan TA in GeographyGDC, Zaida	Lecturer inGeography GPGC,Swabi	AVP
205.	Muhammd Ismail S/O Usman Gul, TA in Urdu, GDC, Zaida	Lecturer inUrdu, GDC, Zaida (Swabi)	AVP
206.	Bilal Hussain S/O Jamshed, TA in Mathematics, GDC, Zaida	Lecturer inMaths-GDC, Zaida (Swabi)	AVP
207.	Anwar Ali S/OMehroz Khan, TA in Computer Science, GDC, Shewa	Lecturer inComputer Science, GPGC,Swabi	AVP
208.	Javez Khan S/ORoshan Khan, TA in Urdu, GDC, Shewa	Lecturer inUrdu, GPGC,Swabi	AVP
209.	Qasim Khan S/O Karim Gul, TA in English, GDC, Shewa	Lecturer inEnglish, GDC,Shewa,Swabi	AVP
210.	Muhammad Adnan S/Omiraj Gul, TA in Pashto, GDC, Yar Hussain	Lecturer inPashto GDC,Daggar	AVP
211.	Sajid Khan S/O Abdul Rehman, TA in Islamiyat, GDC, Yarhussain	Lecturer inIslamiyat, GDC, Yar Hussain (Swabi)	AVP
212.	Saleem Badshah S/OZareen Badshah TA in Computer science, GDC, Yar Hussain	Lecturer inComputer Science, GDC, Totali (Buner)	AVP
213.	Shabir Alam S/O Fakhr e Alam, TA in Pak studies, GDC, Yar Hussain	Lecturer inPak: Studies GDC,Daggar	AVP
214.	Nasir Ali S/O Muhammad Gul, TA in Urdu, GDC, Yar Hussain	Lecturer inUrdu GDC, Yar Hussain (Swabi)	AVP
215.	Mr. Muhammad Jamshed S/OMalik Allah Bakhsh, TA in English, GDC,No.1 D.I.Khan	Lecturer inEnglish GDC,No.1 D.I.Khan	AVP
216.	Mr. Muhammad Rizwan S/O Moazzam, TA in Urdu, GDC,No.1 D.I.Khan	Lecturer inUrdu GDC,No.1 D.I.Khan	AVP
217.	Mr. Muhammad Anwar-ul-Haq S/OQayum Nawaz, TA in Physics, GDC,No.1 D.I.Khan	Lecturer inPhysjcs GDC,No.1 D.I.Khan	AVP
218.	Mr. Binyamin Khan S/O Shah Baraz Khan, TA in Geogrphy, GDC,No.1 D.I.Khan	Lecturer inGeography GDC,No.1 D.I.Khan	AVP
219.	Mr. Riaz Ahmad S/OMumtaz Ahmad TA in English,GDC,No.1 D.I.Khan	Lecturer inEnglish GDC,No.1 D.I.Khan	AVP
220.	Mr. Muhammad Farooq Khan S/O Mir Baaz Khan, TA in Political Science GDC,No.1 D.I.Khan	Lecturer inPolitical Science GDC,No.1 D.I.Khan	AVP

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221.	Mr. Ilyas Khan, TA in Zoology, GDC, No.1 D.I.Khan	Lecturer in Zoology GDC, No.1 D.I.Khan.	AVP
222.	Mr. Inam Ali Shah S/O Gulla Khan TA in Biology, GDC, No.1 D.I.Khan	Lecturer in Biology GDC, No.1 D.I.Khan	AVP
223.	Mr. Sami Ul Haq S/O Sado Khan, TA in Law, GDC, No.1 D.I.Khan	Lecturer in Law GDC, Ghazni Khel	AVP
224.	Mr. Qamar Abbas S/O Malik Ghulam Qasim, TA in Chemistry, GDC, No.2 D.I.Khan	Lecturer in Chemistry GDC, No.1 D.I.Khan	AVP
225.	Mr. Mehar Ali S/O Abdur Rehman TA in Statistics, GDC, Dera Township D.I.Khan	Lecturer in Statistics GDC, No.1 D.I.Khan	AVP
226.	Mr. Muhammad Aslam S/O Kaleem Ullah, TA in Urdu, GDC, Dera Township, D.I.Khan	Lecturer in Urdu GDC, No.1 D.I.Khan	AVP
227.	Mr. Faqir Zada Muhammad Shakeel Khan S/O Hafiz Ghulam Muhammad, TA in Political Science GDC, Dera Township, D.I.Khan	Lecturer in Pol: Science GDC, No.1 D.I.Khan	AVP
228.	Mr. Aamir Abbas S/O Ghulam Abbas TA in Maths GDC, Parova, D.I.Khan.	Lecturer in Maths GDC, Parova, D.I.Khan	AVP
229.	Mr. Karar Hussain Shah S/O Amir Hussain Shah, TA in Biology GDC, Parova, D.I.Khan	Lecturer in Biology GDC, Parova, D.I.Khan	AVP
230.	Mr. Zafar Abbas S/O Abdur Rasheed TA in Political Science, GDC, Parova, D.I.Khan	Lecturer in Pol; Science GDC, No. 1, D.I.Khan	AVP
231.	Mr. Muhammad Zakriya S/O Muhammad Baqir, TA in Pak Study GDC, Parova, D.I.Khan	Lecturer in Pak: Studies GDC, Parova D.I.Khan	AVP
232.	Mr. Irfan Hayat S/O Shah Jehan Khan TA in English GDC, Paniala, D.I.Khan	Lecturer in English GDC, Paniala D.I.Khan	AVP
233.	Mr. Ihsan Ullah Khan S/O Rab Nawaz Khan, TA in Law GDC, Paniala, D.I.Khan	Lecturer in Law GDC, Parova D.I.Khan	AVP
234.	Mr. Sabir Jan S/O Dur Mar Jan, TA in Chemistry GDC, Paniala, D.I.Khan	Lecturer in Chemistry GSSC, Peshawar	AVP
235.	Mr. Rehmat Ullah S/O Haji Laalu Khan, TA in Pak Study, GDC, Paniala D.I.Khan	Lecturer in Pak: Studies GDC, Parova D.I.Khan	AVP
236.	Mr. Muhammad Tufail S/O Qaim Shah, TA in Geography GDC, Paniala, D.I.Khan	Lecturer in Geogrpahy GPGC, Nowshera	AVP
237.	Mr. Muhammad Khalid S/O Muhammad Iqbal, TA in Maths GDC, Paharpur, D.I.Khan	Lecturer in Maths GDC, Paharpur, D.I.Khan	AVP
238.	Mr. Hayat Ullah S/O Sahib Noor TA in Arabic, GDC, Paharpur, D.I.Khan	Lecturer in Arabic, GDC, Paharpur, D.I.Khan	AVP
239.	Mr. Abdullah Khan S/O Muhammad Ibrahim, TA in English GDC, Paharpur, D.I.Khan	Lecturer in English GDC, No.1, D.I.Khan	AVP
240.	Mr. Muhammad Ramzan S/O Moazzam, TA in Urdu GDC, Paharpur, D.I.Khan	Lecturer in Urdu GDC, No.1, D.I.Khan	AVP
241.	Mr. Muhammad Abid S/O Haji Muhammad Hussain, TA in Computer Science GDC, Paharpur, D.I.Khan	Lecturer in Computer Science GDC, No.1 D.I.Khan	AVP

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242.	Mr. Abdul Samad Khan S/O Mahmood Khan, TA in Biology GDC, Paharpur, D.I. Khan	Lecturer in Biology, GDC, No. 1, D.I. Khan	AVP
243.	Mr. Qami Ullah S/O Mamriz Khan TA in Statistics GDC, Paharpur, D.I. Khan	Lecturer in Statistics GDC, Paharpur, D.I. Khan	AVP
244.	Mr. Zahid Javed S/O Haq Nawaz, TA in History GDC, Paharpur, D.I. Khan	Lecturer in Pak: Studies GDC, Paharpur D.I. Khan	AVP
245.	Mr. Hakim Ullah S/O Gul Khanda, TA in Islamiyat, GDC, Paharpur, D.I. Khan	Lecturer in Islamiyat GDC, Tajori Lakki	AVP
246.	Mr. Saeed Anwar Khan S/O Ghulam Sarwar Khan, TA in Chemistry, GDC, Shah Essa Bilot Sharif, D.I. Khan	Lecturer in Chemistry, GDC, Shah Essa Bilot Sharif, D.I. Khan	AVP
247.	Mr. Fateh Ullah S/O Mous Khan, TA in Biology, GDC, Shah Essa Bilot Sharif, D.I. Khan	Lecturer in Biology GDC, Shah Essa Bilot Sharif, D.I. Khan	AVP
248.	Mr. Khalid Mehmood S/O Muhammad Ashiq, TA in Maths, GDC, Shah Essa Bilot Sharif, D.I. Khan	Lecturer in Maths GDC, Shah Essa Bilot Sharif, D.I. Khan	AVP
249.	Mr. Raheem Ullah S/O Saleh Mir Khan, TA in Islamiyat, GDC, Shah Essa Bilot Sharif, D.I. Khan	Lecturer in Islamiyat GDC, Sarai Naurang	AVP
250.	Mr. Muhammad Mohsin kamal S/O Abdul Jabbar, TA in Statistics, GDC, Shah Essa Bilot Sharif, D.I. Khan	Lecturer in Statistics, GDC, Shah Essa Bilot Sharif, D.I. Khan	AVP
251.	Mr. Mudassir Sana S/O Sana Ullah Khan, TA in Physics, GDC, Shah Essa Bilot Sharif, D.I. Khan	Lecturer in Physics GDC, Shah Essa Bilot Sharif, D.I. Khan	AVP
252.	Mr. Waheed Ullah S/O Nasir Iqbal, TA in Library Science GDC, Shah Essa Bilot Sharif, D.I. Khan	Lecturer in Library Science GDC, Shah Essa Bilot Sharif, D.I. Khan	AVP
253.	Mr. Irfan Ullah S/O Muhammad Saleem, TA in Islamiyat, GDC, Shah Essa Bilot Sharif, D.I. Khan	Lecturer in Islamiyat, GDC, Paharpur, D.I. Khan	AVP
254.	Mr. Abdur Rehman Khan S/O Abdur Rauf Khan, TA in English GDC, Kulachi, D.I. Khan	Lecturer in GDC, Kulachi, D.I. Khan	AVP
255.	Mr. Hilal Bahoo S/O Shah Nawaz TA in Urdu GDC, Kulachi, D.I. Khan	Lecturer in Urdu GDC, Essa Bilot Sharif, D.I. Khan	AVP
256.	Mr. Inayat Ullah Khan S/O Rehmat Ullah, TA in Chemistry, GDC, Kulachi, D.I. Khan	Lecturer in Chemistry GDC, Kulachi, D.I. Khan	AVP
257.	Mr. Niamat Ullah S/O Muhammad Ashraf, TA in Pak Study GDC, Kulachi, D.I. Khan	Lecturer in GDC, Kulachi, D.I. Khan	AVP
258.	Mr. Tufail Ahmad Jan S/O Fazal Ahmad, TA in English GDC, Amakhel, Tank	Lecturer in English GDC, Amakhel, Tank	AVP
259.	Mr. Muhammad Bilal S/O Faiz ul Amin, TA in Urdu GDC, Amakhel, Tank	Lecturer in Urdu GDC, Amakhel, Tank	AVP
260.	Mr. Syed Momin Shah S/O Khan Darwaish, TA in Maths GDC, Amakhel Tank	Lecturer in Maths GDC, Amakhel, Tank	AVP

261.	Mr. Muhammad Zia Ul Haq S/O Amin Shah, TA in Statistics GDC, Amakhel, Tank	Lecturer in Statistics GDC No.1, D.I Khan	AVP
262.	Mr. Habib Rehman S/O Shaista Khan TA in Islamiyat GDC, Amakhel, Tank	Lecturer in Islamiyat GDC, Amakhel, Tank	AVP
263.	Mr. Muhammad Sadeeq S/O Hakeem Khan, TA in Chemistry GDC, Amakhel, Tank	Lecturer in Chemistry, GDC, Amakhel, Tank	AVP
264.	Mr. Mohib Ur Rehman S/O Sarwar Jan, TA in Pak Study GDC, Amakhel, Tank	Lecturer in Pak: Studies GDC, Amakhel, Tank	AVP
265.	Mr. Inam Ullah Khan S/O Inayat Ullah Khan, TA in Physics GDC, Amakhel, Tank	Lecturer in Physics, GDC, Amakhel, Tank	AVP
266.	Mr. Habib Ur Rehman S/O Shaukat Ali, TA in Law, GDC, Amakhel, Tank	Lecturer in Law GDC, Amakhel, Tank	AVP
267.	Mr. Muhammad Altaf Anwar S/O Abdul Raziq, TA in Chemistry GDC, Amakhel, Tank	Lecturer in Chemistry GDC, Kulachi, D.I. Khan	AVP
268.	Mr. Arif Ullah S/O Muhammad Ghulam, TA in Urdu, GDC, Tank	Lecturer in Urdu GDC, Sarai Naurang, Lakki	AVP
269.	Mr. Muhammad Sohail S/O Mustafa Khan, TA in Chemistry, GDC, Tank	Lecturer in Chemistry GDC, Tank	AVP
270.	Mr. Abdul Wahab S/O Shahab Uddin TA in History Cum Civics, GDC, Tank	Lecturer in History-cum-Civics GDC, Tank	AVP
271.	Mr. Abid Hussain S/O Muhammad Hussain, TA in Library Science, GDC, Tank	Lecturer in Library Science GDC, Tank	AVP
272.	Mr. Aman Ullah Khan S/O Misal Khan, TA in Maths, GDC, Tank	Lecturer in Maths GDC, Tank	AVP
273.	Mr. Muhammad Sadeeq Khan S/O Mir Aslam Khan, TA in Physics, GDC, Tank	Lecturer in Physics GDC, Tank	AVP
274.	Mr. Tahir Javed S/O Ali Ullah Javed TA in Urdu GDC, Tank	Lecturer in Urdu GDC, Tank	AVP
275.	Mr. Muhammad Fayyaz S/O Sheikh Muhammad Ayaz, TA in History GDC, Tank	Lecturer in History GDC, Tank	AVP
276.	Muhammad Salman S/O Khana Jan TA in Chemistry, GPGC, Bannu	Lecturer in Chemistry GPGC, Bannu	AVP
277.	Adnan Ahmad Khan S/O Muhammad Alamgir Khan, TA in Computer Science GPGC, Bannu	Lecturer in Computer Science GPGC, Bannu	AVP
278.	Zia ur Rehman S/O Shafi ur Rehman TA in Economics, GPGC, Bannu	Lecturer in Economics GPGC, Bannu	AVP
279.	Farman Ullah S/O Abdul Safid, TA in Economics, GPGC, Bannu	Lecturer in Economics GPGC, Bannu	AVP
280.	Sher Abdullah S/O Gul Ramzan Khan TA in English, GPGC, Bannu	Lecturer in English GPGC, Bannu	AVP
281.	Irfan Ullah Khan S/O Aman Ullah Khan, TA in English, GPGC, Bannu	Lecturer in English GPGC, Kohat	AVP
282.	Muhammad Zafir ud din S/O Zia Ud Din, TA in Statistics, GPGC, Bannu	Lecturer in Statistics GPGC, Bannu	AVP
283.	Shah Fahad S/O Farid Ullah Shah, TA in Librarian, GPGC, Bannu	Lecturer in Librarian GPGC, Bannu	AVP
284.	Irfan Ullah S/O Noor Nawaz Khan, TA in Electronics, GPGC, Bannu	Lecturer in Electronics GPGC, Bannu	AVP



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285.	Saud ur Rehman S/O Zafar Ali Khan TA in History cum Civics, GPGC,Bannu	Lecturer inHistory- cum-Civics, GPGC,Bannu	AVP
286.	Irshad Ullah S/O Muhammad Ibrahim. Khan, TA in Zoology, GPGC,Bannu	Lecturer inZoology, GPGC,Bannu	AVP
287.	Muhammad Naseer khan S/O Mir Aqleem khan, TA in English, GDC,No.2 Bannu	Lecturer inEnglish, GPGC,Kohat	AVP
288.	Jamshed Khan S/O Bahadar Nawaz TA in Mathematics, GDC,No.2 Bannu	Lecturer inMathematics, GDC,Thall Hangu	AVP
289.	Imtiaz khan S/O Gul Malook, TA in English GDC, Kakki,Bannu	Lecturer in English, GDC, Kulachi DI Khan	AVP
290.	Sajid Ullah khan S/O Ghafar Ali Khan TA in Urdu, GDC, Kakki,Bannu	Lecturer in Urdu GDC,S K Bala Bannu	AVP
291.	Naqib ullah khan S/O Syed Noor Zali Khan, TA in Computer Science GDC, Kakki,Bannu	Lecturer inCompuer Science, GDC,Domail Bannu	AVP
292.	Imran Ullah khan S/O Mir Sultan, TA in Mathematics GDC, Kakki,Bannu	Lecturer in Maths GDC,Ghori Wala Bannu	AVP
293.	Naveed Akhtar S/O Feroz Khan, TA in Physics, GDC, Kakki,Bannu	Lecturer inPhysics, GDC,Hangu	AVP
294.	Kifayat Ullah S/O Awalya Khan, TA in Maths GDC,Mamshkhel,Bannu	Lecturer in Maths GPGC, Karak	AVP
295.	Arif Zaman S/O Dil Zaman, TA in Maths GDC,Mamshkhel,Bannu	Lecturer in Maths, GDC,Mamsh Khel,Bannu	AVP
296.	Aby Amin S/O Gul Faraz Khan, TA in Law GDC,Mamshkhel,Bannu	Lecturer in Law, GPGC,Charsadda	AVP
297.	Abdul Wajid Khan S/O Nadir Khan, TA in Chemistry GDC,S.K,Bala,Bannu	Lecturer in Chemistry, GPGC, Bannu	AVP
298.	Syed Kashif Ali Shah S/O Safer Ullah Shah, TA in English GDC,Ghowriwala,Bannu	Lecturer in English GDC,No.1D.I.Khan	AVP
299.	Abdul Basit S/O Umar Hayat Khan TA in Maths GDC,Ghowriwala,Bannu	Lecturer in Maths GDC,Ghowriwala,Ban nu.	AVP
300.	Muhammad Wasim Khan S/O Dil Nawaz Khan, TA in Urdu GDC,Ghowriwala,Bannu	Lecturer inUrdu GDC,Ghowriwala,Ban nu	AVP
301.	Muhammad Wasim Shah S/O Murtaza Ali Shah, TA in Urdu, GDC,Domail,Bannu	Lecturer inUrdu GDC,No.1D.I.Khan	AVP
302.	Noor Ayaz Khan S/O Sher Nawaz, TA in Pashto GDC,Domail,Bannu	Lecturer inPashto GDC,DomailBannu	AVP
303.	Taif Ullah S/O Rahat Ullah Khan, TA in HPE, GDC,Domail,Bannu	Lecturer inHPE GDC,Domail,Bannu	AVP
304.	Mirzali Khan S/O Zarbat Khan, TA in English, GDC, Landi Jalander,Bannu	Lecturer inEnglish GC, Peshawar	AVP
305.	Sajjad Ullah S/O Naqeeb ullah, TA in Geography,GDC,LandiJalanderBannu	Lecturer inGeography GDC,Landi Jalander,Bannu	AVP
306.	Abid ur Rehman S/O Bahadar Zaman TA in Zoology, GDC,Landi Jalander,Bannu	Lecturer inZoology GDC,Landi Jalander,Bannu	AVP



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333.	Fakhr ud Din S/O Halawat Khan, TA in Maths GDC, Alpuri, Shangla	Lecturer in Maths GDC, Chakesar, Shangla	AVP
334.	Atta ur Rehman S/O Jehangir, TA in English GDC, Chakesar, Shangla	Lecturer in English GDC, Khwaza Khela	AVP
335.	Shafqat Ali Khan S/O Muhammad Ghafoor Khan, TA in Biology GDC, Chakesar, Shangla	Lecturer in Biology GDC, Chakesar, Shangla	AVP
336.	Muhammad Numan S/O Muhammad shafi, TA in Maths GDC, Chakesar, Shangla	Lecturer in Maths GDC, Batkhela	AVP
337.	Muhammad Iqbal S/O Dost, TA in Chemistry GDC, Puran, Shangla	Lecturer in Chemistry GDC, Puran, Shangla	AVP
338.	Iltaf ud Din S/O Ajab Gul, TA in Physics GDC, Puran, Shangla	Lecturer in Physics GDC, Puran, Shangla	AVP
339.	Fida Hussain S/O Fazal Muhammad, TA in Maths GDC, Puran, Shangla	Lecturer in Maths GDC, Thana	AVP
340.	Naveed Rahim S/O Gul Rahim, TA in Library Science GDC, Puran, Shangla	Lecturer in Library Science GDC, Kabal (Swat)	AVP
341.	Nasar Jalil S/O Rehman Said, TA in Sociology, GPGC, Timergara	Lecturer in Sociology GPGC Swat	AVP
342.	Aziz ur Rahman S/O Muhammad Khan, TA in Islamiyat, GPGC, Timergara	Lecturer in Islamiyat, GPGC, Timergara	AVP
343.	Saddam Hussain S/O Muhammad Saleem Khan, TA in Maths, GPGC, Timergara	Lecturer in Maths GPGC, Timergara	AVP
344.	Izharullah S/O Hanif Ullah, TA in Urdu, GPGC, Timergara	Lecturer in Urdu, GPGC, Timergara	AVP.
345.	Samiur Rahman S/O Abid Ur Rehman, TA in Maths, GPGC, Timergara	Lecturer in Maths GDC Gulabad Dir (Lower)	AVP
346.	Ijaz Ahmad S/O Firdous Khan, TA in Zoology, GPGC, Timergara	Lecturer in Zoology GPGC, Timergara	AVP
347.	Jan Rahman S/O Noor Rehman, TA in History, GPGC, Timergara	Lecturer in History. GPGC, Timergara	AVP
348.	Hasan Said S/O Hakim Said, TA in Urdu, GPGC, Timergara	Lecturer in Urdu GPGC, Timergara	AVP
349.	Pir Zada S/O Umar Zada, TA in Computer Science, GPGC, Timergara	Lecturer in Computer Science, GPGC, Timergara	AVP
350.	Fayaz Khalil S/O Khalil Ur Rehman, TA in Computer Science, GDC, Dir, Upper	Lecturer in Computer Science GDC, Dir, Upper	AVP
351.	Nasib ur Rehman S/O Amir Muhammad, TA in Islamiyat, GDC, Dir, Upper	Lecturer in Islamiyat GDC, Dir, Upper	AVP

352.	Muhib Ullah S/O Muhammad Rahim, TA in Chemistry, GDC,Dir,Upper.	Lecturer inChemistry GDC,Dir,Upper	AVP
353.	Atta ur Rehman S/O Aziz Ur Rehman TA in Maths, GDC,Dir,Upper	Lecturer inMaths GDC,Dir,Upper	AVP
354.	Ibrar Muhammad S/O Haider Khan, TA in Zoology, GDC,Dir,Upper	Lecturer inZoology GDC,Dir,Upper	AVP
355.	Muhammad Iqbal S/O Ahmad Rasool, TA in Sociology, GDC, WariDir Upper	Lecturer in Sociology, GDC, Wari,Dir Upper	AVP
356.	Muhammad wahab S/O Burhan Ud Din, TA in Chemistry, GDC,WariDir Upper	Lecturer in Chemisry GDC,Wari,Dir Upper	AVP
357.	Ikramullah S/O Immad ud Din, TA in Urdu, GDC,Wari,Dir Upper	Lecturer inUrdu GDC,Wari,Dir Upper	AVP
358.	Badshah Hussain S/O Ghulam Habib, TA in political Science,GDC,WariDir Upper	Lecturer inPolitical Science GDC,Wari,Dir Upper	AVP
359.	Rahimullah S/O Rashid Khan, TA in Computer Science, GDC,Samarbagh,Dir,Lower.	Lecturer inComputer Science, GDC,Samarbagh,Dir,L ower	AVP
360.	Muhammad Haqdad S/O Gul Hamid Jan, TA in Computer Science,GDC,Samarbagh,Dir,Lower	Lecturer in Computer Science, GDC,Khanpur Dir Lower	AVP
361.	Hashmat Ali Khan S/O Jehan Badshah, TA in Urdu, GDC, Samarbagh Dir,Lower	Lecturer inUrdu GDC,Samarbagh;Dir,L ower	AVP
362.	Azizur Rahman S/o Umar Hassan, TA in Pak Study, GDC,Samarbagh,Dir,Lower	Lecturer inPak: Studies GDC,Samarbagh,Dir,L ower	AVP
363.	Tufail Ahmad S/O Abdur Rehman, TA in Chemistry GDC,SamarbaghDir,Lower	Lecturer inChemistry GDC,Samarbagh,Dir,L ower	AVP
364.	Hussainullah Khan S/O Adam Khan TA in Maths, GDC,Samarbagh,Dir,Lower	Lecturer inMaths GDC,Samarbagh,Dir,L ower	AVP
365.	Akbar sher S/O Badsha Mulk, TA in English, GDC,SamarbaghDir,Lower	Lecturer inEnglish GDC,Samarbagh, Dir,Lower	AVP
366.	Aftab Alam S/O Muhammad Diyar TA in Botany, GDC,SamarbaghDir,Lower	Lecturer inBotany, GDC,Samarbagh, Dir,Lower	AVP
367.	Umar zeb S/O Noor Afzal Khan, TA in Maths, GDC,Gulabad,Dir,Lower	Lecturer inMaths GPGC Timergara	AVP
368.	Noorul Islam S/O Muhammad shafi, TA in Chemistry, GDC,Gulabad,Dir,Lower	Lecturer inChemistry GDC,Gulabad,Dir, Lower	AVP
369.	Imran Khan S/O Khan Badshah, TA in Islamiyat GDC,Gulabad,Dir,Lower	Lecturer inIslamiyat GDC,Gulabad,Dir, Lower	AVP
370.	Ijaz Ahmad S/O Shabir Khan, TA in Environmental Science, GDC,Gulabad,Dir,Lower	Lecturer inEnvironmental Science GDC,Gulabad,Dir, (L)	AVP
371.	M.Sangeen.khan S/O Masood Khan, TA in Environmental Science, GDC,Gulabad,Dir,Lower	Lecturer in Environmental Science GPGC,Nowshera	AVP
372.	Muhammad Bilal S/O Miskeen Shah, TA in Physics, GPGC,Haripur	Lecturer in Physics GPGC,Haripur	AVP

373.	Shahid Mehmood S/O Bashir Ahmad, TA in Computer Science, GPGC, Haripur	Lecturer in Computer Sc GPGC, Haripur	AVP
374.	Aqeel Aziz S/O Abdur Rashid, TA in Chemistry, GPGC, Haripur	Lecturer in Chemistry GPGC, Haripur	AVP
375.	Shah Ali Asghar S/O Daftar Shah, TA in English, GPGC, Haripur	Lecturer in English GPGC, Haripur	AVP
376.	Muhammad Adil Javed S/O Muhammad Javed, TA in Political Science GPGC, Haripur	Lecturer in Political Science GPGC, Haripur	AVP
377.	Zahid Akbar S/O Ali Akbar, TA in Botany, GDC Ghazi	Lecturer in Botany GDC, Ghazi, Haripur	AVP
378.	Touqeer Iqbal S/O Muhammad Iqbal, TA in Pak Study, GPGC, Mansehra	Lecturer in Pak: Studies GPGC, Mansehra	AVP
379.	Qasim Ali Shah S/O Niaz Ali Shah TA in Physics, GPGC, Mansehra	Lecturer in Physics GPGC, Mansehra	AVP
380.	Abu Bakr Usmani S/O Muhammad Arif, TA in Chemistry, GPGC, Mansehra	Lecturer in Chemistry GPGC, Mansehra	AVP
381.	Muhammad Kaleem S/O Abdul Maroof, TA in Maths, GPGC, Mansehra	Lecturer in Maths GPGC, Mansehra	AVP
382.	Muhammad Qasim S/O Abdul Waheed, TA in Maths GPGC, Mansehra.	Lecturer in Maths GPGC, Mansehra	AVP
383.	Adil Hussain S/O Muhammad Khushal, TA in English GPGC, Mansehra	Lecturer in English GPGC, Mansehra	AVP
384.	Junaid Hussain S/O Fida Hussain, TA in Computer Science, GPGC, Mansehra	Lecturer in Computer Science GPGC, Mansehra	AVP
385.	Syed Muhammad Murtaza S/O Syed Sajid Mian, TA in Political Science, GPGC, Mansehra	Lecturer in Political Science GPGC, Mansehra	AVP
386.	Abid Hussain S/O Abdul Mateen, TA in Statistics, GPGC, Mansehra	Lecturer in Statistics GPGC, Mansehra	AVP
387.	Muhammad Sajjad S/O Muhammad Farooq, TA in Maths, GDC, Balakot, Mansehra	Lecturer in Maths GPGC, Mansehra	AVP
388.	Shehzada Gulfam S/O Gul Rehman TA in Computer Science, GDC, Balakot, Mansehra	Lecturer in Computer Science GDC, Dassu (Kohistan)	AVP
389.	Muhammad Amjad S/O Abdul Qayyum, TA in Political Science GDC, Balakot, Mansehra.	Lecturer in Political Science GDC, Dassu (Kohistan)	AVP
390.	Muhammad Banaras S/O Mir Zaman, TA in Pak Study, GDC, Balakot, Mansehra detailed from GPGC Hraipur.	Lecturer in Pak: Studies GDC, Balakot Mansehra	AVP
391.	Ghulam Mujtaba S/O Ghulam Mustafa TA in English GDC, Balakot, Mansehra	Lecturer in English GDC, Dassu (Kohistan)	AVP
392.	Syed Zulqarnain Shah S/O Syed Gulzar Ahmad Shah, TA in Computer Science GDC, Oghi, Mansehra	Lecturer in Computer Science GPGC, Mansehra	AVP

394.	Aqib Khan Jauoon S/O Khwaja Muhammad, TA in Physics, GDC, Lasan Nawab, Manshira	Lecturer in Physics GPGC, Mandian (Abbottabad)	AVP
395.	Muhammad Imran S/O Shah Zaman TA in Statistics, GDC, Lasan Nawab Manshira	Lecturer in Statistics GDC, Lasan, Nawab Manshira.	AVP
396.	Muhammad Rashid S/O Muhammad Yousaf, TA in English GDC, Lasan Nawab, Manshira	Lecturer in English GDC, Lasan, Nawab, Manshira	AVP
397.	Naseer Ahmad S/O Muhammad Pervez, TA in Maths, GDC, Batagram, Manshira	Lecturer in Maths GDC, Batagram,	AVP
398.	Mujahid Younis S/O Muhammad Younis, TA in Computer Science GDC, Pattan, Kohistan	Lecturer in Computer Science GDC, Pattan, Kohistan	AVP
399.	Bakht Nazar Khan S/O Sultan Zareen, TA in History cum Civics, GDC, Pattan, Kohistan	Lecturer in History-cum-Civics GDC, Pattan, Kohistan	AVP
400.	Sulaiman S/O Sana Ullah, TA in Zoology, GDC, Pattan, Kohistan	Lecturer in Zoology GDC, Dassu, Kohistan	AVP
401.	Adel Ahmad S/O Muhammad Zaheer, TA in Physics, GDC, Darband, Manshira	Lecturer in Physics GPGC, Mandian, Abbottabad	AVP
402.	Sardar Sadique Rehman S/O Sardar Muhammad Ayub, TA in Urdu, GDC, Darband, Manshira	Lecturer in Urdu GDC, Darband, Manshira	AVP
403.	Tasawar Hussain S/O Sarwar Hussain, TA in English, GDC, Darband, Manshira	Lecturer in English GDC, Darband, Manshira	AVP
404.	Bilal Ahmad S/O Muhammad Ashraf, TA in Statistics, GDC, Darband, Manshira	Lecturer in Statistics GDC, Darband, Manshira	AVP
405.	Mr. Irfan Ul Haq S/O Sultan Mehmood TA in English GDC, Dagggar, Buner	Lecturer in English GDC, Dagggar (Buner)	AVP
406.	Mr. Shaukat Ali S/O Zameer Gul, TA in Urdu GDC, Dagggar, Buner	Lecturer in Urdu GDC, Dagggar (Buner)	AVP
407.	Mr. Ahmad Sadiq S/O Ahmad Zubair, TA in Zoology GDC, Dagggar, Buner	Lecturer in Zoology GDC, Dagggar (Buner)	AVP
408.	Mr. Zafar Ali S/O Walayat Khan, TA in Political Science GDC, Dagggar Buner.	Lecturer in Pol: Science GDC, Dagggar (Buner)	AVP
409.	Mr. Murad Ali S/O Akbar Ali, TA in Maths GDC, Dagggar, Buner	Lecturer in Maths GDC, Dagggar (Buner)	AVP
410.	Mr. Kishwar Ali S/O Room Shah, TA in Statistics GDC, Dagggar, Buner	Lecturer in Statistics GDC, Dagggar (Buner)	AVP
411.	Mr. Manzoor Ahmad S/O Taj Ahmad TA in Political Science GDC, Dagggar Buner	Lecturer in Pol: Science GDC, Dagggar (Buner)	AVP
412.	Mr. Naseem Ullah S/O Nowsherawan, TA in Islamiyat GDC, Dagggar, Buner	Lecturer in Islamiyat GDC, Dagggar (Buner)	AVP

413.	Mr. Abdullah S/O Gul Ahmad, TA in Urdu GDC, Totalai, Buner	Lecturer in Urdu GDC, Totalai (Buner)	AVP
414.	Mr. Hezbullah S/O Wali Ullah, TA in Islamiyat GDC, Jower, Buner	Lecturer in Islamiyat GDC, Jower (Buner)	AVP
415.	Mr. Kamran Khan S/O Afsar Khan, TA in Physics GDC, Jower, Buner	Lecturer in Physics GC, Peshawar	AVP
416.	Mr. Ajbar Khan S/O Abdur Rehman, TA in Urdu GDC, Chamla, Buner	Lecturer in Urdu GDC, Chamla (Buner)	AVP
417.	Mr. Khalil Ahmad S/O Ahmad Amin, TA in Islamiyat GDC, Chamla, Buner	Lecturer in Islamiyat GDC, Daggar (Buner)	AVP
418.	Mr. Shaukat Ali S/O Jehanzeb Khan, TA in Islamiyat GDC, Chamla, Buner	Lecturer in Islamiyat GDC, Chamla (Buner)	AVP
419.	Mr. Noor Ul Akbar S/O Gul Sadbar, TA in HPE GDC, Chamla, Buner	Lecturer in HPE GDC, Chamla (Buner)	AVP
420.	Mr. Gohar Ali S/O Abdul Hussain Shah, TA in Law, GDC, Chamla, Buner	Lecturer in Law GDC, Chamla (Buner)	AVP
421.	Mr. Waqar Alam S/O Rehman Ghanim TA in Pak Study GDC, Chamla, Buner	Lecturer in Pak: Studies GDC, Chamla (Buner)	AVP
422.	Mr. Zarish Khan S/O Farosh, TA in English GDC, Chamla, Buner	Lecturer in English GDC, Chamla (Buner)	AVP
423.	Mr. Islam Ul Haq S/O Abdul Haq, TA in Zoology GDC, Chamla, Buner	Lecturer in Zoology GDC, Daggar (Buner)	AVP
424.	Mr. Ibrahim S/O Farid Gul, TA in History cum civics, GDC, Chamla Buner	Lecturer in History-cum-Civics GDC, Chamla (Buner)	AVP
425.	Mr. Atta Ullah S/O Said Zameen, TA in Maths GDC, Chamla, Buner	Lecturer in Maths GDC, Chamla (Buner)	AVP
426.	Mr. Rahat Subhan S/O Zamin Zada, TA in Statistics GDC, Chamla, Buner	Lecturer in Statistics GDC, Chamla (Buner)	AVP
427.	Mr. Faisal Habib S/O Noor Habib, TA in English, GPGC, Kohat	Lecturer in English GDC, Sabirabad, Karak	AVP
428.	Mr. Riasat Mehmood S/O Pio Din, TA in Urdu, GPGC, Kohat	Lecturer in Urdu GPGC, Kohat	AVP
429.	Mr. Sharafat Ullah S/O Muhammad Azim, TA in Statistics, GPGC, Kohat	Lecturer in Statistics GPGC, Kohat	AVP
430.	Syed Haris Shah S/O Syed Mussarat Shah, TA in Islamiyat, GPGC, Kohat	Lecturer in Islamiyat GPGC, Kohat	AVP
431.	Mr. Muhammad Kamran S/O Noor Pio Jan, TA in Physics, GPGC, Kohat	Lecturer in Physics GPGC, Kohat	AVP
432.	Mr. Fazal Hussain S/O Muhammad Hussain, TA in Chemistry, GPGC, Kohat	Lecturer in Chemistry GPGC, Kohat	AVP
433.	Mr. Abdullah Khattak S/O Sahib Din, TA in Zoology, GPGC, Kohat	Lecturer in Zoology GPGC, Kohat	AVP
434.	Mr. Ihtesham Aziz S/O Aziz Ur Rehman, TA in Political Science, GPGC, Kohat	Lecturer in Pol: Science GPGC, Karak	AVP
435.	Mr. Ghani Rehman S/O Abdul Sattar TA in Geography, GPGC, Kohat	Lecturer in Geography GPGC, Kohat	AVP
436.	Mr. Saleem Khan S/O Muhammad Nazif Khan, TA in Botany, GPGC, Kohat	Lecturer in Botany GPGC, Kohat	AVP
437.	Mr. Faiz Ur Rehman S/O Abdul Tawab TA in Computer Science GPGC, Kohat	Lecturer in Computer Science GPGC, Kohat	AVP

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Ge Khung Khela Smart  
31-5-2018

438.	Mr. Muhammad Alamzeb Khan S/O Mashal Khan, TA in Urdu, GDC,Lachi Kohat	Lecturer in Urdu GPGC,Kohat	AVP
439.	Mr. Shahid Munir S/O Akhtar Munir, TA in Economics, GDC,Lachi, Kohat	Lecturer in Economics GPGC,Kohat	AVP
440.	Mr. Ayaz Khan S/O Said Hawas, TA in Islamiyat, GDC,Lachi,Kohat	Lecturer in Islamiyat GPGC,Kohat	AVP
441.	Mr. Naik Muhammad S/O Bahadur Zaman, TA in Biology, GDC,Lachi Kohat	Lecturer in Biology GDC,Lachi,Kohat	AVP
442.	Mr. Waqar Ahmad S/O Abdur Rauf, TA in Urdu, GDC,Gumbat,Kohat	Lecturer in Urdu GDC,Gumbat,Kohat	AVP
443	Mr. Muhammad Nadir S/O Noor Salam Jan, TA in Chemistry GDC,KDA Kohat	Lecturer in Chemistry GPGC,Kohat	AVP
444.	Mr. Naqid Zaman S/O Muslim Khan, TA in Political Science, GDC,KDA,Kohat	Lecturer in Pol: Science GDC,KDA,Kohat	AVP
445.	Mr. Aamir Sultan S/O Mir Shah Jahan Khan, TA in Maths, GDC,KDA,Kohat	Lecturer in Maths GDC,KDA,Kohat	AVP
446.	Mr. Muhammad Ali S/O Muhammad Ayaz, TA in HPE ,GDC,Hangu	Lecturer in HPE GDC,Hangu	AVP
447.	Mr. Asif Rehman S/O Muhammad Rehman, TA in Maths, GDC,Hangu	Lecturer in Maths GDC,Hangu	AVP
448.	Mr. Jamil Khan S/O Taza Khan, TA in Political Science, GDC,Hangu	Lecturer in Pol; Science GDC,Hangu	AVP
449.	Mr. Daud Ahmad S/O Muhammad Rafiq, TA in Islamiyat, GDC,Hangu	Lecturer in Islamiyat GDC,Hangu	AVP
450.	Mr. Taj Muhammads/O Sharaf Khan TA in Urdu, GDC,Hangu	Lecturer in Urdu GDC,Hangu	AVP
451.	Mr. Muhammad Zohaib Khan S/O Muhammad Ramzan, TA in Chemistry GDC,Hangu	Lecturer in Chemistry GDC,Hangu	AVP
452.	Mr. Shams Ul Zaman S/O Lal Hanan TA in English, GDC,Hangu	Lecturer in English GDC,Hangu	AVP
453.	Mr. Rashid Ullah S/O Gul Marjan, TA in Physics, GDC,Hangu	Lecturer in Physics GDC,Hangu	AVP
454.	Mr. Shakeel Ahmad S/O Abdul Qadir, TA in Urdu, GDC,Thall,Hangu	Lecturer in Urdu GDC,Hangu	AVP
455.	Mr. Majid Iqbal S/O Khan Zamir, TA in Pak Study, GDC,Thall,Hangu	Lecturer in Pak: Studies GPGC,Kohat	AVP
456.	Mr. Muhammad Ramzan S/O Dawaran Khan, TA in History cum Civics, GDC,Thall,Hangu	Lecturer in History-cum- Civics GDC,Hangu	AVP
457.	Mr. Muhammad Irfan S/O Nawab Nawaz, TA in Biology, GDC,Thall,Hangu	Lecturer in Biology GPGC,Lakki Marwat	AVP
458.	Mr. Hayat Ullah S/O Gul Muhammad TA in Maths, GDC,Thall,Hangu	Lecturer in Maths GDC,No.1 D.I.Khan	AVP
459.	Mr. Amir Aslam S/O Ghulam Akbar TA in Statistics GDC,Thall,Hangu	Lecturer in Statistics GDC,Hangu	AVP
460.	Mr. Yousaf Khan S/O Mirdal Khan TA in Chemistry, GDC,Thall,Hangu	Lecturer in Chemistry GPGC,Kohat	AVP



## TERMS AND CONDITIONS.

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- i. They will have all rights / privileges contained in Khyber Pakhtunkhwa Civil Servants Act, 1973 with all amendments made therein including Khyber Pakhtunkhwa Civil Servants (Amendment) Act, 2013 and Rules made thereunder.
- ii. In case of resignation, they will have to give one-month prior notice. In absence of such notice, their one-month pay shall be forfeited to Government.
- iii. The selectees must join their posts within 30-days of the issuance of this Notification failing which it shall be presumed that they are not interested to join the same. Charge report should be submitted to all concerned. The Director, Higher Education, Khyber Pakhtunkhwa, Peshawar should furnish a certificate to the effect that the appointees have joined their posts or otherwise, after one month of the issuance of this Notification.
- iv. In case of disciplinary matters, Khyber Pakhtunkhwa Government Servants, (Efficiency & Disciplinary Rules), 2011 shall be applicable.
- v. They will be on probation for a period of one year extendable for another year with specific order of the competent authority within two months of the expiry of first year of probation period in terms of Section-15 amended on 07.12.2017 of Appointment, Promotion, and Transfer Rules, 1989.
- vi. They will undergo mandatory training for the purpose of promotion / direct recruitment, as the case may be.
- vii. They will get pay in BPS-17 including usual allowances as admissible under the rules.
- viii. They will be entitled to annual increment like other Civil Servants.
- ix. Their seniority shall be determined in light of Section-4 of the Khyber Pakhtunkhwa Teaching Assistants (Regularization of Services) Act, 2017.

SECRETARY TO GOVT. OF  
KHYBER PAKHTUNKHWA.  
HIGHER EDUCATION DEPARTMENT

Endst: No. & Date Even.

Copy forwarded to the: -

1. Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
2. Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
3. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
4. Secretary to Governor, Khyber Pakhtunkhwa.
5. Secretary (Infrastructure, Coordination & Administration Department, FATA Secretariat, Warsak Road, Peshawar.
6. Accountant General, Khyber Pakhtunkhwa, Peshawar.
7. Director, Higher Education, Khyber Pakhtunkhwa, Peshawar w/r to get verified the Educational documents from the concerned institutions.
8. Director Education (FATA), Khyber Pakhtunkhwa, Warsak Road, Peshawar.
9. Director, Information for wide publicity through media.
10. Districts/Agency Accounts Officers concerned.
11. Principals, Government Colleges (Male) concerned.
12. P.S. to Minister for Higher Education, Khyber Pakhtunkhwa.
13. P.S. to Secretary, Higher Education Department.
14. Lecturers concerned.

  
(MUHAMMAD FAYAZ KHAN)  
SECTION OFFICER (COLLEGES-II)

116/11/11  
113-05/118  
D.I. Khan

Annexure 5

"B"

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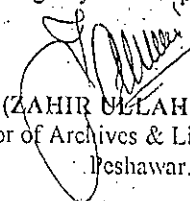
GOVERNMENT OF N.W.F.P.  
DIRECTORATE OF ARCHIVES & LIBRARIES

Dated Peshawar the 26th February, 2008

OFFICE ORDER

No. 259 /3/1/DA&L. Consequent upon the recommendation of NWFP, Public Service Commission, Peshawar the Competent Authority has been pleased to appoint Miss. Shahla Tahir d/o Mr. Muhammad Tahir, resident of village & Post Office Prang, Tehsil & District Charsadda as Librarian BS-16 (5050-390-16750) on contract basis, in the Directorate of Archives & Libraries, NWFP, Peshawar and posted against the newly created post of Librarian (BS-16) at Mufti Mahmood Public Library, D.I. Khan with immediate effect on the following terms and conditions:-

1. Your appointment will be on Contract basis as per Government Policy for Contract Employees subject to your medical fitness.
2. Your services will be liable to termination on one month's notice from either side. In case of resignation without notice your two-month pay/allowances, if any shall be forfeited in favour of Government.
3. Being a contract employee you will not contribute to G.P. Fund and you will not be entitled to pension/Gratuity benefits, however 10% of the minimum of your pay and an equal amount will be contributed by the Government toward your C.P. Fund.
4. The Contract period will be for three years as per Finance Department Policy No. FD (SOSR-III) 12-1/2002, dated 26.10.2002.
5. You would be on probation for a period of two years.
6. You should join the post within 30-days of the issuance of this order.
7. You will be governed by such rules and regulations as per Contract Policy issued by the Government or may be issued from time to time by Government.
8. Your services can be terminated at any time in case your performances are not found satisfactory and you will be proceeded against under the Removal from Service (Special Power) Ordinance, 2000 and the E&D Rules, 1973.
9. No TA/DA will be admissible to you for the joining of your new post.

  
(ZAHIR ULLAH KHAN)  
Director of Archives & Libraries, NWFP,  
Peshawar.  
BR / FR  
P-157  
P-160

Endst: No. \_\_\_\_\_ /3/1/DA&L. Dated Peshawar the \_\_\_\_\_ February, 2008

Copy forwarded to:-

1. The Private Secretary to Secretary Higher Education, Archives & Libraries Department.
2. The District Account Officer D.I. Khan
3. The Deputy Secretary-1, NWFP, Public Service Commission, Peshawar with reference to your letter No. SRC/Lib/Archives/11447, dated 19.2.2008.
4. Miss. Shahla Tahir d/o Mr. Muhammad Tahir, resident of village & Post Office Prang, Tehsil & District Charsadda
5. Office Order File.

Director of Archives & Libraries, NWFP,  
Peshawar.

Annex 'e' 30  
22  
2  
GOVERNMENT OF N.W.F.P  
HIGHER EDUCATION, ARCHIVES  
AND LIBRARIES DEPARTMENT

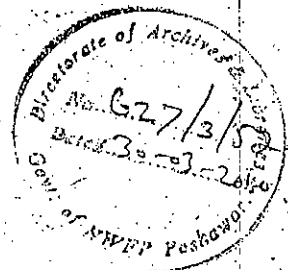
Dated Peshawar the 29-03-2010

**NOTIFICATION:**

No:SO(A&L)HE/17-1/2010/VOL-IV.

On the recommendations of Departmental Promotion Committee, the Competent Authority is pleased to promote the following Librarians / Cataloguers (Male/Female) from B-16 to B-17 (regular) of the Directorate of Archives and Libraries NWFP, who hold Master Degrees, against the up-graded posts, with immediate effect:-

1. Mr Muhammad Ashfaq Ahmad,  
Librarian, Mardan Public Library, Mardan.
2. Mr. Naved Ullah Jan,  
Cataloguer, Directorate of Arch & Lib: NWFP.
3. Mr Anwar Jalal,  
Librarian, Bannu Public Library, Bannu.
4. Mr Mohammad Nadeem Iqbal,  
Librarian, Directorate of Archives, NWFP.
5. Mr Muhammad Rafi,  
Librarian, Swat Public Library, Swat.
6. Mr Zair Ullah,  
Librarian, Swabi Public Library, Swabi.
7. Miss Shalah Tahir,  
Librarian, Directorate of Archives NWFP.
8. Mr Shah Nawaz,  
Librarian, Mufti Mahmood Public Library, D.I.Khan.
9. Miss Mahnaz Begum,  
Librarian, Directorate of Archives, NWFP.
10. Mr Mir Akbar Shah,  
Cataloguer, Directorate of Archives, NWFP.



SECRETARY TO GOVT. OF NWFP  
HIGHER EDUCATION, ARCHIVES  
AND LIBRARIES DEPARTMENT

EndstNo.SO(A&L)HE/17-1/2010/VOL-IV

Dated Pesh: the 29-03-2010

Copy is forwarded for information & necessary action to the:-

1. Accountant General NWFP.
2. Secretary to Government of NWFP, Finance Department.
3. Secretary to Government of NWFP, Establishment Department.
4. Director Archives and Libraries, NWFP.
5. P.S to Chief Minister NWFP, Peshawar.
6. P.S to Chief Secretary NWFP, Peshawar.
7. P.S to Minister Higher Education NWFP, Peshawar.
8. P.S to Secretary Higher Education Arch: & Lib: Deptt: NWFP.
9. Director Information, NWFP, Peshawar.
10. District Account Officers concerned in NWFP.
11. PA to Deputy Secretary (Admn), Higher Education Department.
12. PA to Deputy Secretary-II, Higher Education Deptt. NWFP.
13. Officers concerned.
14. Manager Govt. Printing and Stationer Department, NWFP.

30/3/10  
30/3/10



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES AND  
LIBRARIES DEPARTMENT

Dated Peshawar the August 30, 2018.

NOTIFICATION

**NO. SOIC-IV/HE/17-1/Seniority/Lib.** In Exercise of Power conferred under sub-section (1) of Section -8 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 read with 4(b) of Khyber Pakhtunkhwa Civil Servants APT, Rules 1989, Establishment Department letter No. SOR-1(E&AD) 3-15/88 (Vol-I) dated 09-05-2012, the Competent Authority is pleased to approve the Seniority List of the Male Librarian (BPS-17) of Directorate of Higher Education Department, Khyber Pakhtunkhwa as it stood on 31-05-2018 is as under:-

S#	Name of Officer	Qualification	Date of Birth with Domicile	Date of 1 <sup>st</sup> Entry into Government Service.	Date of 1 <sup>st</sup> appointment in the office.	Date of Regular appointment/promotion to the present post		Method of Appointment to the present position	Remarks
						Date	BPS		
1.	Mr. Abdul Kalam, Lib: GDCLachi Kohat	MLISc	20-06-1965 Kohat	28-10-2003	26-10-2003	01/01/2010	BPS-17	By Promotion	Up. Gradation / promotion vide notification no. SO(T)HE/17-1/2008 Vol III dated 31/01/2010
2.	Mr. Zulfiqar Ali Khan Lib: GPGC Mansehra	-do-	13/10/1976 Mansehra	01/11/2003	01/11/2003	01/01/2010	-do-	-do-	-do-
3.	Mr Muhammad, Ali khan Lib: GDC Kohi Sher Haider	-do-	10/04/1982 Charsadda	03/01/2006	03/01/2006	01/01/2010	-do-	-do-	-do-
4.	Mr. Shoaib Jan, Lib: GDCKatlang	-do-	13/01/1979 Charsadda	03/01/2006	03/01/2006	01/01/2010	-do-	-do-	-do-
5.	Mr. Dawood Shah, Lib: GDC GarhiKapura (Mardan)	-do-	25/11/1980 M. Agency	23/01/2006	23/01/2006	01/01/2010	-do-	-do-	-do-

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1	2	3	4	5	6	7	8	9	10
6.	Mr. Muhammad Nawaz Lib:GPGDC Abbotabad	-do-	19/12/1978 Mansehra	03/12/2006	03/12/2006	01/01/2010	-do-	-do-	-do-
7.	Mr. Muhammad Quraish, Lib: GDC Jawar Buner	-do-	23/04/1966 Buner	01/11/1987	31/12/2006	01/01/2010	-do-	-do-	-do-
8.	Mr. Hidayat Ullah, Lib: GDC Tajori	-do-	05/03/1981 LakkMarwat	19/01/2007	19/01/2007	01/01/2010	BPS-17	-do-	-do-
9.	Mr. Syed Zaib Ullah shah, Lib: GDC Chagharmati	-do-	01/11/1981 Peshawar	17/03/2007	17/03/2007	01/01/2010	-do-	-do-	-do-
10.	Mr. Rizwan Ullah, Lib: GDC Toru, Mardan	-do-	26/04/1979 Peshawar	21/05/2004	01/03/2007	01/01/2010	-do-	-do-	-do-
11.	Mr. Karim Khan, Lib: GDC Babozai, Mardan	-do-	02/02/1981 Dir	31/01/2007	31/01/2007	01/01/2010	-do-	-do-	-do-
12.	Mr. Shah Khalid, Lib: GDC Yar Hussain Swabi	-do-	01/01/1982 Kurran Agency	20/01/2007	20/01/2007	01/01/2010	-do-	-do-	-do-
13.	Mr. Sher Bahadar, Lib: GDC Landi Jalander Bannu	-do-	24/02/1975 LakkMarwat	01/12/2007	01/12/2007	01/01/2010	-do-	-do-	-do-
14.	Mr. Atta-Ur-Rehman, Lib: GDC Ghoriwala	-do-	15/03/1982 LakkMarwat	28/11/2007	28/11/2007	01/01/2010	-do-	-do-	-do-
15.	Mr. Irfan Ullah, Lib: GPGDC Charsadda	-do-	10/02/1978 Charsadda	28/11/2007	28/11/2007	01/01/2010	-do-	-do-	-do-
16.	Mr. Hamd Ullah Jan, Lib: GDC Naguman Peshawar	-do-	11/08/1982 Peshawar	28/11/2007	28/11/2007	01/01/2010	-do-	-do-	-do-
17.	Mr. Muhammad Ayez, Lib: GPGDC Swabi	-do-	04/04/1978 Swabi	28/11/2007	28/11/2007	01/01/2010	-do-	-do-	-do-
18.	Mr. Shakir Masood, Lib: GPGDC No.1 Abbotabad	-do-	22/11/1982 Abbotabad	28/11/2007	28/11/2007	01/01/2010	-do-	-do-	-do-
19.	Mr. Irfan Ullah Jan, Assistant Director A & L Deptt.	-do-	05/03/1978 Peshawar	22/04/1999	28/11/2007	01/01/2010	-do-	-do-	-do-
20.	Mr. Shahid Ali, Lib: GDC Hayatabad	-do-	10/03/1983 Peshawar	28/11/2007	28/11/2007	01/01/2010	-do-	-do-	-do-
21.	Mr. Khan Badshah, Lib: GDC Nawagai Bajawar	-do-	11/03/1975 Dir	28/11/2007	28/11/2007	01/01/2010	BPS-17	-do-	-do-
22.	Mr. Zia Ullah Khan, Lib: GDC Totakan	-do-	08/04/1982 Malakand Agency	28/11/2007	28/11/2007	01/01/2010	-do-	-do-	-do-

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23.	Mr. Hafiz Jehan Zeb Khan, Lib: GPGDC LakkiMarwat	--do--	20/12/1979 LakkiMarwat	13/12/2007	13/12/2007	01/01/2010	--do--	--do--	--do--
24.	Mr. Ihtisham Ullah Khan, Lib: GDC Paniata DI Khan	--do--	01/05/1984 DI Khan	28/11/2007	28/11/2007	01/01/2010	--do--	--do--	--do--
25.	Mr. Imtiaz Alam, Lib: GDC Badraga Malakand	--do--	17/04/1978 Malakand Agency	28/11/2007	28/11/2007	01/01/2010	--do--	--do--	--do--
26.	Mr. Sajjad Ali, Lib: GDC Lakaro Mohmand Agency	--do--	01/03/1982 Mohmand Agency	01/12/2007	01/12/2007	01/01/2010	--do--	--do--	--do--
27.	Mr. Muhammad Qaisar Khan, Lib: GPGDC Mardan	--do--	01/01/1976 Mohmand Agency	29/11/2007	29/11/2007	01/01/2010	--do--	--do--	--do--
28.	Mr. Mazzaullah Khan, Lib: GDC Shawa Swabi	--do--	11/11/1981 Mohmand Agency	28/11/2007	28/11/2007	01/01/2010	--do--	--do--	--do--
29.	Mr. Abdul Razzaq Librarian Khan Pur	--do--	18/02/1966 Haripur	28/11/2007	28/11/2007	01/01/2010	--do--	--do--	--do--
30.	Mr. Muhammad Shafiq, Lib: GDC Sherwan	--do--	23/04/1979 Abbottabad	30/04/2011	24/09/2009	30/04/2011	BPS-17	By Promotion	vide Notification No SO(A&L)HE/17-1/2011 Dated: 30/04/2011
31.	Mr. Ahmad Hussain, Lib: SK Bala Bannu	--do--	01/05/1974 LakkiMarwat	01/05/2011	24/09/2009	30/04/2011	--do--	--do--	--do--
32.	Mr. Ali Rehman, Lib: Archives & Library Peshawar	--do--	10/04/1976 Mardan	01/05/2011	24/09/2009	30/04/2011	--do--	--do--	--do--
33.	Mr. Hamid Ali, Lib: GDC Nathia Gali A/Abad	--do--	15/12/1979 Mohmand Agency	01/05/2011	24/09/2009	30/04/2011	--do--	--do--	--do--
34.	Mr. Ihsan Ullah Khan Assistant Director Libraries Directorate of Higher Education	--do--	23/03/1987 Peshawar	20/05/2011	20/05/2011	19/05/2011	--do--	By initial recruitment through PSC	Seniority position has been recorded according to the merit order of PSC
35.	Mr. Shariq Ahmad, Lib: GDC Zaida Swabi	--do--	08/03/1985 Lahor Swabi	23/05/2011	23/05/2011	19/05/2011	--do--	--do--	--do--
36.	Mr. Irfan Ullah, Lib: GDC Khan Kohli Nizampur	--do--	12/02/1984 Peshawar	19/05/2011	19/05/2011	19/05/2011	--do--	--do--	--do--
37.	Mr. Mudassar Shah, Lib: GDC Madyan Swat	--do--	10/03/1986 Charsadda	20/05/2011	20/05/2011	19/05/2011	--do--	--do--	--do--
38.	Mr. Saif Ullah Jan, Lib: GDC Dornail Bannu	--do--	15/09/1982 Charsadda	24/05/2011	24/05/2011	19/05/2011	--do--	--do--	--do--

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1	2	3	4	5	6	7	8	9	10
39.	Mr. Zafar Iqbal, Lib: GDC Ara Khel FR Kohat.	--do--	FR Peshawar	01/04/2011	01/04/2011	29/03/2011	--do--	--do--	--do--
40.	Mr. Tahir Ullah, Lib: GDC KDA Kohat.	--do--	24/07/1986 Peshawar	23/05/2011	23/05/2011	19/05/2011	--do--	--do--	--do--
41.	Mr. Jameel Khan, Lib: Government College Palai	--do--	08/01/1987 Mardan	19/05/2011	20/05/2011	19/05/2011	BPS-17	--do--	--do--
42.	Mr. Sajid Ullah, Lib: GDC Shabqadar Charsadda.	--do--	29/12/1985 Charsadda	19/05/2011	19/05/2011	19/05/2011	--do--	--do--	--do--
43.	Mr. Bashir Ahmad, Lib: GDC Kakki Bannu	--do--	07/01/1975 Lakkimaruwat	20/05/2011	20/05/2011	19/05/2011	--do--	--do--	--do--
44.	Mr. Shekil Khan, Government College Peshawar	--do--	14/03/1982 Peshawar	25/05/2011	25/05/2011	19/05/2011	--do--	--do--	--do--
45.	Mr. Sadaqat Ullah, Lib: GDC Gandaf Swabi.	--do--	16/11/1982 Peshawar	31/05/2011	31/05/2011	19/05/2011	--do--	--do--	--do--
46.	Mr. Hafiz Basraj Gul Lib: GPGDC Nowshera.	--do--	02/03/1984 Charsadda	21/05/2011	21/05/2011	19/05/2011	--do--	--do--	--do--
47.	Mr. Roshan Khan, Lib: GDC Ghazi	--do--	03/04/1985 Swabi	20/05/2011	20/05/2011	19/05/2011	--do--	--do--	--do--
48.	Mr. Usman Ghani, Lib: GPGDC KharBajawar	--do--	04/07/1984 FR Peshawar	26/04/2011	26/04/2011	29/03/2011	--do--	--do--	--do--
49.	Mr. Mohammad Ali, Lib: GDC Gumbat Kohat	--do--	06/04/1983 Kohat	20/05/2011	20/05/2011	19/05/2011	--do--	--do--	--do--
50.	Mr. Khan Zaib, Lib: GDC KhwazaKhela Swat	--do--	15/03/1979 Malakand Agency	17/06/2011	17/06/2011	19/05/2011	--do--	--do--	--do--
51.	Mr. Navid Hussain, Lib: GDC Khan Pur (L) Dir.	--do--	01/04/1982 Malakand	20/05/2011	20/05/2011	19/05/2011	--do--	--do--	--do--
52.	Mr. Altaf Hussain, Lib: GDC Chitral	--do--	20/02/1983 Chitral	20/05/2011	20/05/2011	19/05/2011	BPS-17	--do--	--do--
53.	Mr. Ikram Ullah, Lib: GDC DaggarBunir	--do--	03/09/1972 Bunir	26/04/1993	20/05/2011	19/05/2011	--do--	--do--	--do--
54.	M.Hanif Shah, Lib: GDC No.2 DJ Khan	--do--	14/04/1966 Bannu	10/09/1991	10/09/1991	10/04/2012	--do--	By Promotion	Vide Notification No. SO[C-IV]/HE/8-6/2012 dated 10-04-2012



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55.	Mr. Shoukat Ullah Lib: GDC No.1 D.I Khan	--do--	07/04/1985 LakkiMarwat	19/11/2012	19/11/2012	19/11/2012	--do--	By Initial recruitment Through PSC	Seniority position has been recorded according to the merit order of PSC
56.	Mr. Muqadar Khan, Lib: GDC Jamrud	MLISC	02/04/1982 Khyber Agency	20/02/2013	20/02/2013	20/02/2013	--do--	--do--	--do--
57.	Mr. Murad Khan, Lib: GDC Kotha Swabi	--do--	02/04/1982 Bajawar Agency	20/02/2013	20/02/2013	20/02/2013	--do--	--do--	--do--
58.	Mr. Muhammad Idrees Khan, Lib: GDC Tajori (LakkiMarwat)	--do--	04/04/1987 LakkiMarwat	01/12/2012	01/12/2012	19/11/2012	--do--	--do--	--do--
59.	Mr. Zafar Ali, Lib: GDC Oghi (Mansehra)	--do--	05/11/1987 Abbotabad	02/05/2014	02/05/2014	12/03/2014	--do--	--do--	--do--
60.	Mr. Abdullah Lib GDC Barkhalozai	--do--	10/04/1985 Bajawar Agency	24/07/2015	24/07/2015	24/07/2015	--do--	--do--	--do--
61.	Mr. Abid Ullah, Lib: GDC Chamla	--do--	01/04/1979 Charsadda	30/06/2015	30/06/2015	25/06/2015	--do--	--do--	--do--
62.	Mr. Rafeeq Ahmad, Lib: Archives & Libraries Peshawar	--do--	15/02/1988 Peshawar	13/12/2007	26/06/2015	25/06/2015	BPS:17	--do--	--do--
63.	Mr. Naimat Ullah Shah Lib: GDC No.2 Bannu	--do--	19/11/1980 Bannu	26/06/2015	26/06/2015	25/06/2015	--do--	--do--	--do--
64.	Mr. Najmullah, Lib: GDC AkoraKhattak NSR	--do--	27/02/1983 Peshawar	26/06/2015	26/06/2015	25/06/2015	--do--	--do--	--do--
65.	Mr. Mehmood Ul Hassan, Lib: GDC Wan (Dir Upper)	--do--	01/03/1986 Dir Upper	29/06/2015	29/06/2015	25/06/2015	--do--	--do--	--do--
66.	Mr. Farhan Gul, Lib: GDC Agra	--do--	03/07/1988 Peshawar	29/06/2015	29/06/2015	25/06/2015	--do--	--do--	--do--
67.	Mr. Adnan, Lib: GDC Akbarpura (Nowshera)	--do--	07/01/1987 Charsadda	07/08/2012	01/07/2015	25/06/2015	--do--	--do--	--do--
68.	Mr. Khair ul Bashar, Lib: GDC Mamesh Khel (Bannu)	--do--	01/03/1980 Charsadda	26/06/2015	26/06/2015	25/06/2015	--do--	--do--	--do--
69.	Mr. Ataullah Khan, Lib: GDC Tank	--do--	05/09/1987 LakkiMarwat	26/06/2015	26/06/2015	25/06/2015	--do--	--do--	--do--
70.	Mr. Muhammad Latif, Lib: GDC Samar Bagh (L) Dir	--do--	02/03/1976 Dir Lower	24/03/2003	26/06/2015	26/06/2015	--do--	70	--do--
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71.	Mr. Syed Meraj Afif Shah, Lib: GDC Puran( Shangle)	-do-	05/01/1988 Chitral	06/07/2015	06/07/2015	25/06/2015	-do-	71	-do-
72.	Mr. M.Basir Lib GDC Kotka Habibullah FR Bannu	-do-	25/09/1987 Mohmand Agency	18/07/2012	24/07/2015	24/07/2015	BPS-17	-do-	-do-
73.	Mr. Abdul Razzaq, Lib: GDC Lassan Nawab (Mansehra)	-do-	06/01/1979 Mansehra	13/12/2007	01/07/2015	12/06/2015	-do-	-do-	-do-
74.	Mr. Ahmad Shah Lib GDC Sada Kuram Agency	-do-	02/02/1984 Mohmand Agency	27/07/2015	27/07/2015	24/07/2015	-do-	-do-	-do-
75.	Mr. M. Ilyas Lib GDC Darzinda FR Di Khan	-do-	10/06/1984 Mohmand Agency	27/07/2015	27/07/2015	24/07/2015	-do-	-do-	-do-
76.	Mr. Muhammad Saeed, Lib: GDC Pattan (Kohistan)	-do-	04/02/1977 Abbottabad	27/06/2015	27/06/2015	25/06/2015	-do-	-do-	-do-
77.	Mr. Ejaz Muhammad, Lib: GDC Batagram	-do-	01/10/1966 Mansehra	28/01/2016	28/01/2016	27/01/2016	-do-	-do-	-do-
78.	Mr. Shakeel Ahmed, Lib: GDC Amakhel (Tank)	-do-	25/04/1964 Mansehra	01/02/2016	01/02/2016	27/01/2016	-do-	-do-	-do-
79.	Mr. Muhammad Ikhlaq, Lib: GPGDC No.2 Mandian (Abbottabad)	-do-	20/04/1988 Abbottabad	28/01/2016	28/01/2016	27/01/2016	-do-	-do-	-do-

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION DEPARTMENT

Endst. No. & Date as above.

Copy forwarded to the:

1. Director Higher Education Department, Khyber Pakhtunkhwa with the request to circulate amongst all the concerned.
2. Deputy Director (HEMIS) Cell Higher Education Department with the request to upload the same on the official website of the department.
3. PS to Secretary, Higher Education Department
4. Master File

(MAHSAL KHAN)  
SECTION OFFICER (C-IV)

(E) (37)

DIRECTORATE OF ARCHIVES & LIBRARIES,  
KHYBER PAKHTUNKHWA, PESHAWAR.

FINAL SENIORITY LIST OF LIBRARIANS (BPS-17/BPS-18), DIRECTORATE OF ARCHIVES & LIBRARIES, KHYBER PAKHTUNKHWA  
AS IT STOOD ON 20-11-2017.

Annex

Name of Officer	Qualification	Date of Birth with Domicile	Date of 1 <sup>st</sup> Entry into Govt: Service	Date of 1 <sup>st</sup> appointment / promotion to the position of Librarian(BS-16)/ Cataloguer(BS-16).	Date of acquiring of MLISc.	Date of Regular Promotion/Appointment to present position.	Method of Recruitment/ Appointment	Remarks/Signature
(i)	(ii)	(iii)	(iv)	(v)	(vi)	(vii)	(viii)	(ix)
1. Mrs. Raheela Hafeez, Librarian(BS-18), Directorate of Archives & Libraries, Peshawar	MLISC, M.A(Urdu)	19-07-1964 D.I.Khan-IV	30-11-1991 BPS-16	30-11-1991 Librarian(BPS-16)	03-09-1991	(i)- 18-01-2000 Librarian(BS-17) (ii)- 30-11-1991 Librarian BPS-17 (iii)- 16-11-2015 Librarian(BPS-18)	By promotion	(i)- Promoted to the position of Librarian (BS-17) on 18-01-2000. (ii)- Granted retrospective upgradation in BPS-17 w.e.f. the date of acquiring of MLISc MLISc (date of appointment i.e. 30-11-1991, vide notification No.SO(C-IV)HE/17-2/2012 dated 24-08-2017. (iii)- Post of the Librarian upgraded from BS-17 to 18(regular) @ 33% ratio against the total sanctioned posts vide notification No. SO(C-IV)HE/17/03-2012/1094 dated 16-11-2015.
2. Mr. Musharraf Shah, Librarian (BS-18), Public Library, Mardan	MLISC, M.A (English)	16-12-1960 Charsadda-II	23-01-1979 BPS-05	28-04-1993 Cataloguer(BS-16)	25-09-2007	(i)- 21-01-2008 Librarian(BPS-17) (ii)- 16-11-2015 Librarian(BPS-18)	By Promotion	(i)- Promoted to the position of Cataloguer (BS-16) on 28-04-1993. (ii)- Promoted from the position of Cataloguer (BS- 16) as Librarian (BS-17) on 21-01-2008. (iii)- Post of the Librarian upgraded from BS-17 to 18(regular) @ 33% ratio against the total sanctioned posts vide notification No. SO(C-IV)HE/17/03-2012/1094 dated 16-11-2015.

03	Mr. Dilshad Hussain, Librarian (BS-18), Public Library, Abbottabad.	MA, MLISC, B.Ed.	09-03-1964 Nowshera-II	27-10-1983 BPS-10	27-07-1992 Librarian(BPS-16)	10-03-2012	(i)- 08-06-2012 Librarian(BPS-17)  (ii)- 16-11-2015 Librarian(BPS-18)	By Initial	(i)- Appointed as Librarian (BPS-16) on 27-07-1992. (ii)- Promoted to the upgraded post of Librarian (BPS-17) on the basis MLISC degree on 08-06-2012. (iii)- Seniority in upgraded position of Librarian (BPS-17) has been determined under para-02 of the notification No. SO(T)/HE/17-1/2003 Dated 21-01-2008. (iv)- Post of Librarian upgraded from BS-17 to 18(regular) @ 33% ratio against the total sanctioned posts of Librarian in BPS-16 vide notification No. SO(C-IV)/HE/17/03-2012/1094 dated 16-11-2015.
04	Mr. Muhammad Ashfaq Ahmad, Librarian (BS-18), Directorate of Archives and Libraries, Peshawar	Ph.D(Library Science) MLISC, LLB.	25-04-1971 Charsadda-II	18-07-1994 BS-16	18-07-1994 Librarian(BS-16)	21-09-1994	(i)- 29-03-2010 Librarian(BS-17)  (ii)- 21-09-1994 Librarian(BPS-17)  (iii)- 16-11-2015 Librarian(BPS-18)	By Initial	(i)- Appointed as Librarian (BPS-16) on 18-07-1994. (ii)- Promoted to the upgraded post of Librarian(BPS-17) on the basis of MLISC on 29-03-2010. (iii)- Granted retrospective upgradation w.e.f. date of acquiring of MLISC i.e.21-09-1994 vide notification vide notification No. SO(C-IV)/HE/17-2/2012 dated 24-08-2017. (iv)- Post of the Librarian upgraded from BPS-17 to 18(egular) @ 33% ratio against the total sanctioned posts vide notification No. SO(C-IV)/HE/17/03-2012/1094 dated 16-11-2015. (iv)- Departmental appeal of Mr. Muhammad Ashfaq Ahmad, Librarian against the seniority of the Librarians mentioned at serial No. 02 & 03 of the list, has been turned down vide letter No.SO(C-IV)/HE/1-Seniority/DA&L /2017/3619 dated 22-08-2017.

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<p>8</p> <p>Shahla Tahir, Librarian (BPS-17), Directorate of Archives &amp; Libraries, Peshawar.</p> <p>237</p> <p>32</p>	<p>MLISC</p>	<p>16-03-1983 Charsadda-II</p>	<p>BPS-16</p>	<p>Librarian(BPS-16)</p>	<p>26-02-2008</p>	<p>17-09-2007</p>	<p>(i)- 29-03-2010 Librarian(BPS-17)  (ii)- 07-03-2008 Librarian(BPS-17)</p>	<p>(iii)- Librarian (BPS-17) on the basis of on 29-03-2010  Granted retrospective upgradation of BPS-16 to 17 w.e.f. the date of acquisition MLISC(date of appointment to position of Librarian BPS-16 i.e. 2008 vide notification No. IV)/HE/17- 2/2012 dated 24-04-2014.  (iv)- Seniority positions of the Librarian serial No. 08, 09 &amp; 10 have been determined as per merit communicated vide Deputy Secretary, Public Commission's letter No. 35360 dated 21-04-2014.</p>
<p>09</p> <p>Muhammad Rafi, Librarian(BPS-17), Swat Public Library, Swat.</p>	<p>MLISC</p>	<p>01-01-1983 Chitral-III</p>	<p>26-02-2008 BPS-16</p>	<p>26-02-2008 Librarian(BPS-16)</p>	<p>17-09-2007</p>	<p>(i)- 29-03-2010 Librarian(BS-17)  (ii)- 26-02-2008 Librarian(BS-17)</p>	<p>By Initial</p>	<p>(i)- Appointed as Librarian(BPS-16) on 2008. (ii)- Promoted to the upgraded Librarian (BPS-17) on the basis of MLISC on 29-03-2010 (iii)- Granted retrospective upgradation of BPS-16 to 17 w.e.f. the date of acquiring of MLISC( appointment to the position of Librarian(BPS-16) i.e. 26-02-2008 notification NO. SO(C-IV)HI dated 24-08-2017</p>
<p>10</p> <p>Zair Ullah, Librarian (BPS-17), Public Library, Swabi.</p>	<p>MLISC</p>	<p>09-03-1981 FATA-I</p>	<p>26-02-2008 BPS-16</p>	<p>26-02-2008 Librarian(BPS-16)</p>	<p>29-09-2008</p>	<p>(i)- 29-03-2010 Librarian(BPS-17)</p>	<p>By Initial</p>	<p>(i)- Appointed as Librarian(BPS-16) on 2008 (ii)- Promoted against the upgrade of Librarian (BPS-17) on the basis of on 29-03-2010.</p>
<p>11</p> <p>Shah Nawaz, Librarian (BPS-17), Mufti Mahmood Public Library, D.I.Khan.</p>	<p>MLISC</p>	<p>01-05-1967 D.I.Khan-IV</p>	<p>14-05-1985 BPS-05</p>	<p>06-07-2009 Librarian(BPS-16)</p>	<p>15-07-2005</p>	<p>(i)- 29-03-2010 Librarian(BPS-17)</p>	<p>By Initial</p>	<p>(i)- Appointed as Librarian (BPS-17) on 2009. (ii)- Promoted against the upgrade of Librarian (BPS-17) on the basis of on 29-03-2010.</p>

05	Navced-Ullah-Jan Librarian(BPS-18), Directorate of Archives and Libraries, Peshawar	M.A (History).	Charsadda-II	BS-16	Cataloguer(BS-16)				(i)- 29-03-2010 Librarian(BPS-17)  (ii)- 16-11-2015 Librarian(BPS-18)	(ii)- Cadre of the Cataloguer upgraded from BPS-16 to 17 and re-designated as Librarian(BPS-17) vide SO(Arch. & Lib.), Higher Education, Archives & Libraries Department notification No. SO(T)HE/16-59/2009/Vol:II dated 29-06-2009. Upgraded in BPS-17 w.e.f. 29-03-2010.  (iii)- Post of Librarian upgraded from BS-17 to 18(regular) at 33% ratio against the total sanctioned posts vide notification No. SO(C-IV)HE/17-30/2012/1094 dated 16-11-2015.
06	Anwar Jalal, Librarian (BPS-18), Public Library, Bannu.	MLISC	30-03-1965 Karak-IV	28-04-1992 BS-08	29-04-1997 Librarian(BPS-16)	03-09-1991	By Promotion	(i)- 29-03-2010 Librarian(BPS-17)  (ii) 29-04-1997 Librarian(BPS-17)  (iii)- 16-11-2015 Librarian(BPS-18)	(i)- Promoted to the position of Librarian (BS-16) on 29-04-1997.  (ii)- Promoted against the upgraded post of Librarian (BPS-17) on the basis of MLISC on 29-03-2010.  (iii)- Granted retrospective upgradation w.e.f. the date of acquiring of MLISC(date of promotion to the position of Librarian(BPS-16) i.e. 29-04-1997 vide notification No. SO(C-IV)HE//17-2/2012 dated 24-08-2017.  (iv)- Post of Librarian upgraded from BS-17 to 18(regular) at 33% ratio against the total sanctioned posts vide notification No. SO(C-IV)HE/17-30/2012/1094 dated 16-11-2015 w.e.f. 16-11-2015.	
07	Muhammad Nadeem Iqbal, Librarian (BS-17), Directorate of Archives and Libraries, Peshawar	MLISC	15-12-1965 Peshawar-II	23-04-1992 BS-08	14-04-2003 Librarian(BPS-16)	03-09-1991	By Promotion	(i)- 29-03-2010 Librarian (BPS-17)  (ii)- 14-04-2003 Librarian(BPS-17)	(i)- Promoted to the position of Librarian (BPS-16) on 14-04-2013.  (ii)- Promoted against the upgraded post of Librarian (BPS-17) on the basis of MLISC on 29-03-2010.  (iii)- Granted retrospective upgradation from BPS-16 to 17 w.e.f. the date of acquiring of MLISC(date of promotion to the position of Librarian BPS-16) i.e. 14-04-2003 vide notification No. SO(C-IV)HE/17-2/2012 dated 24-08-2017.	

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<p>234</p> <p>119</p>	<p>Shahla Tahir, Librarian (BPS-17), Directorate of Archives &amp; Libraries, Peshawar.</p>	<p>MLISC</p>	<p>16-03-1983 Charsadda-II</p>	<p>BPS-16</p>	<p>Librarian(BPS-16)</p>	<p>(i)- 29-03-2010 Librarian(BPS-17)  (ii)- 07-03-2008 Librarian(BPS-17)</p>	<p></p>	<p>Librarian (BPS-17) on the basis of on 29-03-2010  (iii)- Granted retrospective upgradation of BPS-16 to 17 w.e.f the date of acqu MLISC(date of appointment to position of Librarian BPS-16 i.e. 2008 vide notification No. IV)/HE/17- 2/2012 dated 24-  (iv)- Seniority positions of the libr serial No.08, 09 &amp; 10 hav determined as per merit communicated vide Deputy Secretary, Public Commission's letter No. 35360 21-04-2014.</p>
<p>09</p>	<p>Muhammad Rafi, Librarian(BPS-17), Swat Public Library, Swat.</p>	<p>MLISC</p>	<p>01-01-1983 Chitral-III</p>	<p>26-02-2008 BPS-16</p>	<p>26-02-2008 Librarian(BPS-16)</p>	<p>17-09-2007  (i)- 29-03-2010 Librarian(BS-17)  (ii)- 26-02-2008 Librarian(BS-17)</p>	<p>By initial.</p>	<p>(i)- Appointed as Librarian(BPS-16 on 2008. (ii)- Promoted to the upgraded Librarian (BPS-17) on th MLISC on 29-03-2010. (iii)- Granted retrospective upgradation BPS-16 to 17 w.e.f the acquiring of MLISC( appointment to the po: Librarian(BPS-16) i.e. 26-02-200 notification NO. SO(C-IV)HI dated 24-08-2017</p>
<p>10</p>	<p>Zair Ullah, Librarian (BPS-17), Public Library, Swabi.</p>	<p>MLISC</p>	<p>09-03-1981 FATA-I</p>	<p>26-02-2008 BPS-16</p>	<p>26-02-2008 Librarian(BPS-16)</p>	<p>29-09-2008  (i)- 29-03-2010 Librarian(BPS-17)</p>	<p>By Initial</p>	<p>(i)- Appointed as Librarian(BPS-16 2008 (ii)- Promoted against the upgrad Librarian (BPS-17) on the basis on 29-03-2010.</p>
<p>11</p>	<p>Shah Nawaz, Librarian (BPS-17), Mufti Mahmood Public Library, D.I.Khan.</p>	<p>MLISC</p>	<p>01-05-1967 D.I.Khan-IV</p>	<p>14-05-1985 BPS-05</p>	<p>06-07-2009 Librarian(BPS-16)</p>	<p>15-07-2005  (i)- 29-03-2010 Librarian(BPS-17)</p>	<p>By Initial</p>	<p>(i)- Appointed as Librarian (BPS-1 2009: (ii)- Promoted against the upgraded Librarian (BPS-17) on the ba on 29-03-2010.</p>



Annex  
(E)  
(42)

11334(W/E)  
20-12-2019

**BEFORE THE WORTHY CHIEF SECRETARY, KHYBER PAKHTUNKHWA,**  
**PESHAWAR**

Subject: **DEPARTMENTAL APPEAL AGAINST NOTIFICATION NO.SO(C-IV)HED/1-6/2019, DATED: 18.12.2019, VIDE WHICH NOTIFICATION OF EVEN NUMBER DATED: 17.12.2019 HAS BEEN WITHDRAWN WITH IMMEDIATE EFFECT.**

**Prayer-in-Appeal:**

On acceptance of instant appeal, notification dated: 18.12.2019 may be declared as coram non judge, illegal, ab-initio void and of no legal effect, hence be set at naught, in the best interest of justice and equity.

=====

**Respected Sir,**

1. That appellant was appointed as Librarian (BS-16), by the competent authority, on the recommendations of the KP Public Service Commission, on contract basis, in the Directorate of Archives & Libraries, KP Peshawar, vide Office Order No.259/3/1/DA&L, dated: 26.02.2008 and was subsequently regularized in service, in pursuance of Khyber Pakhtunkhwa Employees (Regularization of Services) Act, 2009 (KP Act No.XVI of 2009) and was promoted by the competent authority, on the recommendations of the Departmental Promotion Committee, to BPS-17 against the upgraded post, vide Notification No.SO(A&L)HE/17-1/2010/VOL-IV, dated: 29.03.2010 and having more than eleven years' spotless career at her credit.
2. That appellant was assigned additional duties of overall supervision of all affairs of the newly established public library at Charsadda, by the competent authority, vide Office Order No. 3833/3/1/DA, dated: 27.02.2019, but, instead to transfer her services against the sanctioned post, created specifically for the library ibid, Mr. Imtiaz Ali, Librarian, Government Degree College Zarobi, Swabi, being non-cadre, has been transferred to the library ibid, vide Notification dated 06.08.2019.
3. That appellant has assailed notification dated: 06.08.2019 supra through Departmental Appeal, received vide Diary No.1462 dated: 04.09.2019, which was considered at appropriate level and the competent authority has been pleased to order the transfer of appellant from Directorate of Archives & Libraries KP at Peshawar to Public Library Charsadda, vide Notification No.SO(C-IV)HED/1-6/2019/8384-88, dated: 17.12.2019, in compliance whereof, appellant assumed charge on the same date i.e. 17.12.2019, by submitting charge assumption report to the Director, Directorate of Archives & Libraries KP at Peshawar.

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4. That transfer notification dated: 17.12.2019 supra, of the appellant, has been withdrawn, with immediate effect, by the competent authority, vide Notification No. SO(C-IV)HED/1-6/ 2019, dated: 18.12.2019, after assumption of charge.
5. That Mr. Imtiaz Ali, Librarian, is employee of the Directorate of Higher Education, while appellant is employee of the Directorate of Archives & Libraries and both of them belongs to different cadres i.e. Higher Education & Archives/Libraries, having separate seniority lists, needless to add that the Public Library Charsadda is functioning under the administrative control and supervision of the Directorate of Archives & Libraries, Khyber Pakhtunkhwa, therefore, appellant is the suitable person to be transferred against the sanctioned post of Librarian in the said Library, such factum may also be confirmed from notification dated: 17.12.2019, moreover, Mr. Imtiaz Ali, being non-cadre, could not be posted against the cadre post, in view of law/rules governing the subject, needless to add that the impugned notification is premature besides being coram non judice, hence liable to be struck down.
6. That, any other additional ground, with the permission of the esteemed authority, will be taken at the time of personal hearing, if granted.

It is, therefore, requested that on acceptance of instant appeal, notification dated: 18.12.2019 may be declared as coram non judice, illegal, ab-initio void and of no legal effect, hence be set at naught, in the best interest of justice and equity.

Faithfully yours

Shahla Tahir

**MST. SHAHLA TAHIR**

Librarian (BPS-17)

Archives & Libraries,

Khyber Pakhtunkhwa Peshawar

Cell : 0333-9278148

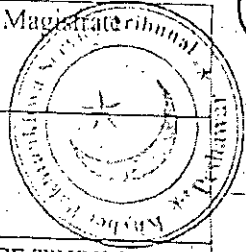
Dated: 20.12.2019

Amir

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Sr. No	Date of order/proceedings	Order or other proceedings with signature of Judge or Magistrate
1	2	3
	09.08.2019	<p style="text-align: center;"><b>BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL</b>  <b>Service Appeal No. S23/2019</b></p> <p>Date of Institution ..... 24.06.2018  Date of Decision ..... 09.08.2019</p> <p>Dr. Hameed Ali S/o Sadaf Ali Agency Surgeon/Merged Area District Kurram.  <span style="float: right;">Appellant</span></p> <p style="text-align: center;">Versus</p> <ol style="list-style-type: none"> <li>1. Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar.</li> <li>2. Secretary Health Department Government of Khyber Pakhtunkhwa, Peshawar.</li> <li>3. Director General Health Services Government of Khyber Pakhtunkhwa, Peshawar.</li> <li>4. Dr. Moeen Begum AHQ Hospital Parachinar.</li> </ol> <p style="text-align: right;">Respondents</p> <p>Mr. Muhammad Hamid Mughal-----Member(J)  Mr. Ahmad Hassan-----Member(E)</p> <p style="text-align: center;"><u>JUDGMENT</u>  <u>MUHAMMAD HAMID. MUGHAL, MEMBER: - Appellant</u></p> <p>present. Learned counsel for appellant present. Mr. Muhammad Jan learned Deputy District Attorney for official respondents present. Private respondent No.4 alongwith counsel present.</p> <ol style="list-style-type: none"> <li>2. The appellant "Senior Medical Officer (BS-18)" has filed the</li> </ol>



9.8.2019

ATTESTED

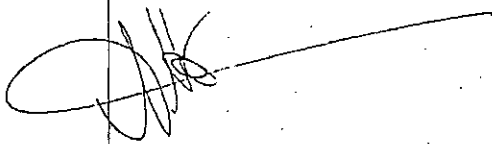
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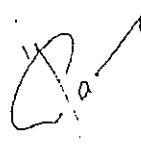
Management Cadre Post whereas both the appellant and private respondent No.4 belong to General Cadre.

7. Learned counsel for the appellant could not demonstrate that under the relevant rules, how a Medical Officer/Senior Medical Officer of General Cadre can be appointed against the Management Cadre post. Director Health Services Merged Areas Peshawar has exceeded his authority by issuing transfer posting order dated 07.03.2019 in relation to the appellant (BS-18) and private respondent No.4 (BS-19).

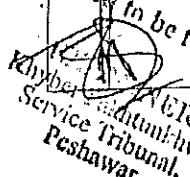
8. In the light of above, the appellant has not been able to seek indulgence of this Tribunal. Consequently the respondent department is directed to appoint suitable officer from Management Cadre, against the post of Agency Surgeon Merged Area Kurram, within 15 days of the receipt of this judgment. The respondent department is further directed to recall all the transfer posting orders of Medical Officer/Senior Medical Officers against the posts of Management Cadre. The present service appeal is disposed of in the above noted terms. Parties are left to bear their own costs. File be consigned to the record room.



(Ahmad Hassan)  
Member



(Muhammad Hamid Mughal)  
Member

**Certified to be true copy**  
  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

**ANNOUNCED** Date of Presentation of Appeal 28-8-19  
09.08.2019 Number of Words 1200  
Copying Fee 16-00  
Urgent 4-00  
Total 20-00

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present service appeal being aggrieved against the order dated 14.03.2019 whereby his transfer from the post of Senior Medical Officer AHQ Hospital Parachinar to the post of Agency Surgeon Merged Area Kurram in place of private respondent No.4, was withdrawn.

3. Learned counsel for the appellant argued that vide order dated 07.03.2019 the appellant was transferred from the post of Senior Medical Officer AHQ Hospital Parachinar to the post of Agency Surgeon Merged Area Kurram however with in a few days of the issuance of the said order the same was withdrawn vide impugned order dated 14.03.2019. Further argued that the impugned order is premature and in utter violation of laws, rules and policy. Further contended that private respondent No.4 has already been posted as Agency Surgeon Merged Area Kurram since 2014 but she is not willing to leave the said post.


4. As against that learned Deputy District Attorney assisted by learned counsel for private respondent No.4, argued that the posting order of the appellant as Agency Surgeon Merged Area Kurram was issued by the incompetent authority. Further argued that the post of Agency Surgeon (BS-18) falls to the share of Health Management Cadre in BS-18 while the appellant belongs to General Cadre and that cross cadre posting is against the Health Management Cadre Service Rules, 2008. Next contended that the transfer posting order dated 07.03.2019 was illegal hence rightly withdrawn.

5. Arguments heard. File perused.

6. There is no dispute that the post of Agency Surgeon is a

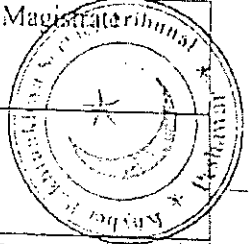
28.8.2019

ATTESTED

  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

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Sr. No	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate
1	2	3
<p style="text-align: center;"><b>BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL</b>  <b>Service Appeal No. 823/2019</b></p> <p style="text-align: center;">Date of Institution ..... 24.06.2018  Date of Decision ..... 09.08.2019</p> <p>Dr. Hameed Ali S/o Sadaf Ali Agency Surgeon/Merged Area District Kurram.</p> <p style="text-align: right;">Appellant</p> <p style="text-align: center;">Versus</p> <ol style="list-style-type: none"> <li>1. Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar.</li> <li>2. Secretary Health Department Government of Khyber Pakhtunkhwa, Peshawar.</li> <li>3. Director General Health Services Government of Khyber Pakhtunkhwa, Peshawar.</li> <li>4. Dr. Moeen Begum AHQ Hospital Parachinar.</li> </ol> <p style="text-align: right;">Respondents</p> <p>09.08.2019  Mr. Muhammad Hamid Mughal-----Member(J)  Mr. Ahmad Hassan-----Member(E)</p> <p style="text-align: center;"><u>JUDGMENT</u>  <u>MUHAMMAD HAMID MUGHAL, MEMBER: -</u> Appellant</p> <p>present. Learned counsel for appellant present. Mr. Muhammad Jan learned Deputy District Attorney for official respondents present. Private respondent No.4 alongwith counsel present.</p> <ol style="list-style-type: none"> <li>2. The appellant "Senior Medical Officer (BS-18)" has filed the</li> </ol>		



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**ATTESTED**

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## Posting and Transfer Policy

FOI Appellate

## Statutory Provision.

## Section 10 of the KP Civil Servants Act, 1973.

Posting and Transfer. Every civil servant shall be liable to serve anywhere within or outside the Province, in any post under the Federal Government, or any Provincial Government or Local authority, or a Corporation or body set up or established by any such Government:-

Provided that nothing contained in this section shall apply to a civil servant recruited specifically to serve in a particular area or region;

Provided further that, where a civil servant is required to serve in a post outside a service or cadre, his terms and conditions of service as to his pay shall not be less favourable than those to which he would have been entitled if he had not been so required to serve.

## Posting/transfer policy of the Provincial Government.

- i) All the posting/transfers shall be strictly in public interest and shall not be abused/misused to victimize the Government servants
- ii) ~~All Government servants are prohibited to exert political, Administrative or any other pressures upon the posting/transfer authorities for seeking posting/transfers of their choice and against the public interest.~~
- iii) All contract Government employees appointed against specific posts, cannot be posted against any other post.
- iv) ~~Period of posting/transfer for settled areas shall be two years for unattractive areas, 1 1/2 years and for hard areas one year.~~
- v) Deleted vide No. SOR-VII/4/2008/VOL-VI DATED 3-6-2008.
- vi) \*While making posting/transfers of officers/officials up to BS-17 from settled areas to FATA and vice versa approval of the Chief Secretary, KP needs to be obtained. Save Tehsildars/Naib Tehsildars within a division in respect of whom the concerned Commissioner will exercise the same power. Whereas, in case of posting/transfer of officers in BS-18 and above, from settled areas to FATA and vice versa, specific approval of the Governor, KP shall be obtained.

Provided that the power to transfer Political Tehsildars and Political Naib Tehsildars within FATA between different divisions shall rest in Additional Chief Secretary FATA.

\*Para VI added vide No. SOR-VI/E&AD/1-4/2010/VOL-VIII dated 20-03-2010

- vi (a) deleted vide No. SOR-VII/E&AD/1-4/2010/VOL-IX dated 24-11-2017
- vii) Officers may be posted on executive/administrative posts in the Districts of their domicile except Deputy Commissioner and Superintendent of Police. Similarly Deputy Superintendent of Police shall not be posted at a place where the Police Station (Thaana) of his area/residence is situated.
- viii) No posting/transfers of officers/officials on detailment basis shall be made.
- viii-A) \*Guide lines to facilitate posting of husband and wife at the same station:-
  - a. Where a request is made for posting at a different station in the same department/service/cadre in which an employee is already serving, the request may be accepted subject to availability of a post in the same BPS.

- b. If request involves temporary deputation to another department, it may be processed in consultation with the concerned department and may be accepted on the prescribed terms of deputation subject to availability of a post in the same BPS.
- c. If there is a tie between two or more Government servants for posting at the same station in the same department of an organization, Government servant with greater length of service may be preferred.
- d. Request for posting by a spouse facing serious medical problem may be recorded highest priority.
- e. Spouses already posted at one station, including those posted on deputation may normally not be disturbed without compelling reasons of public interests. Requests for extension of deputation period beyond the permissible limit may be considered with compassion if interests of public service would permit.

Para viii-a added vide \*No. SOR-VI/E&AD/1-4/2010/Vol-VIII dt: 7-8-2012

- ix) Regarding the posting of husband/wife, both in Provincial services, efforts where possible be made to post such persons at one station subject to public interest.
- x) All the posting/transferring authorities may facilitate the posting/transfer of unmarried female Government Servants at station of residence of their parents.
- xi) Officers/officials except DC and SP who are due to retire within one year may be posted on their option on posts in the Districts of their domicile and be allowed to serve there till the retirement

DC and SP who are due to retire in the near future may also be posted in the District of their domicile subject to the condition that such posting would be against non-administrative posts of equivalent scales;

xi-A) Officer in BPS-17 and above should not be posted in district of their domicile \*[Doctors, Lecturers, Subject Specialists, Principals/Vice Principals and other teachers in BPS-17 & above working in Health and Education Department in all districts of Government of Khyber Pakhtunkhwa shall be exempted from the application of the said policy. However, the subject policy shall remain applicable on all Administrative /Executive positions in BPS-17 & above across the Province.]

- xi -B) Cancellation of posting transfer issued with the approval of the competent authority may not be made without seeking formal approval of the competent authority through summary.

Paras xi-A & xi-B added vide . No. SOR-VI/E&AD/1-4/2010/Vol-VIII dt: 11-11-12013 & 14-2-2014 & \* text added 21-3-2014 respectively.

- xii) In terms of Rule 17(1) and (2) read with Schedule-III of the KP Government Rules of Business 1985, transfer of officers shown in column 1 of the following table shall be made by the authorities shown against each officer in column 2 thereof:

Outside the Secretariat		
1.	Officers of the all Pakistan Unified Group i.e. DMG, PSP including Provincial Police Officers in BPS-18 and above.	Chief Secretary in consultation with Establishment Department and Department concerned with the approval of the C.M.
2.	Other officers in BPS-17 and above to be posted against scheduled posts, or posts normally held by the APUG, PCS(EG) and PCS(SG).	-do-
3.	Heads of Attached Departments and other Officers in B-19 & above in all the Departments.	-do-



In the Secretariat		
1.	Secretaries	Chief Secretary with the approval of the Chief Minister.
2.	Other Officers of and above the rank of Section Officers: a) Within the Same Department b) Within the Secretariat from one Department to another.	Secretary of the Department concerned. Chief secretary/Secretary Establishment.
3.	Officials up to the rank of Superintendent: a) Within the same Department b) To and from an Attached Department c) Within the Secretariat from one Department to another	Secretary of the Department concerned. Secretary of the Department in consultation with Head of Attached Department concerned. Secretary (Establishment)

iii) While considering posting/transfer proposals all the concerned authorities shall keep in mind the following:

- To ensure the posting of proper persons on proper posts, the Performance Evaluation Report/annual confidential reports, past and present record of service, performance on post held presently and in the past and general reputation with focus on the integrity of the concerned officers/ officials be considered.
- Tenure on present post shall also be taken into consideration and the posting/transfers shall be in the best public interest.

xiv) Government servants including District Government employees feeling aggrieved due to the orders of posting/transfer authorities may seek remedy from the next higher authority / the appointing authority as the case may be through an appeal to be submitted within seven days of the receipt of such orders. Such appeal shall be disposed of within fifteen days. The option of appeal against posting/ transfer orders could be exercised only in the following cases.

- Pre-mature posting/transfer or posting transfer in violation of the provisions of this policy.
- Serious and grave personal (humanitarian) grounds.

2. To streamline the postings/transfers in the District Government and to remove any irritant/confusions in this regard the provision of Rule 25 of the Khyber Pakhtunkhwa District Government Rules of Business 2001 read with schedule - IV thereof is referred. As per schedule-IV the posting/transferring authorities for the officers/officials shown against each are as under:-

S. No.	Officers	Authority
1.	Posting of Deputy Commissioner and District Officer in a District.	Provincial Government.
2.	Posting of District Police officer.	Provincial Government
3.	Other Officers in BPS-17 and above posted in the District.	Provincial Government
4.	Official in BPS-16 and below.	District Officer in consultation with Deputy Commissioner.

3. As per Rule 25(2) of the Rules mentioned above the District Commissioner shall consult the Government if it is proposed to:

a) Transfer the holder of a tenure post before the completion of his tenure or extend the period of his tenure.

b) Require an officer to hold charge of more than one post for a period exceeding two months.

4. It may be ensured that tenures of the concerned officers/officials are invariably mentioned in summaries submitted to the Competent Authorities for Posting/ Transfer.

(No: SOR-VI/E&AD/1-4/2003 dated 24-6-2003).

#### Other important notifications.

- Posting/Transfer of the officers upto BPS-18 may be made at the level of Department concerned in consultation with Minister Incharge & officers of BPS-19 & above after seeking prior approval of the Chief Minister. No.SO(O&M)(E&AD)3-15/2007 dated 26-7-2014
- All officers shall properly brief the incoming officers while vacating their position in future. No.SOR-VI/E&AD/1-4/2010/Vol.-VII dated 18-6-2014
- Officers shall not be considered for posting & transfer as long as they are under inquiry. No.SOR-VI/E&AD/2-6/2014/Vol.-VII dated 04-03-2015
- No direct correspondence regarding posting/transfer should be made with Federal Government and rules/policies should strictly be observed/followed.

No.SOR-VI/E&AD/1-4/2010/Vol.-VIII dated 01-09-2015

#### Posting/transfer from FATA and vice versa.

Centrally Administered Tribal Areas (Employees' Status) Order 1972 (President's Order No. 13 of 1972) provides that:

"Notwithstanding anything contained in their condition of service, the employees shall from the appointed day, be the employees of the Provincial Government on deputation to the Federal Government and shall work under the overall administrative control of the Provincial Government, on the same terms and conditions of service as respects remuneration, leave and pension and the same rights as respects disciplinary matters or tenure of office as were applicable to them immediately before that day, provided that the employees shall not be entitled to deputation allowance for their service after the appointed day".

2. According to the Posting/Transfer Policy of the Provincial Government, the Governor, KP and the Chief Secretary KP are the competent authorities for posting/transfer of Civil Servants in BS-18 and above and up to BS-17 respectively. All officers/officials selected against ZAONE-1/FATA quota in the provincial Services should compulsory serve in FATA for at least 36 months in each grade. This should start from senior most scale/grades downwards in each scale/grade of each cadre. Para 2 substituted vide No.SO(Policy)E&AD/1-4/2010 dated 24/11/2017

3. It is evident from the above that employees serving in FATA are under the administrative control of the Provincial Government. However, after establishment of FATA Secretariat it was felt imperative to have linkage between the Provincial Departments and the FATA Secretariat so that public service delivery does not suffer due to frequent reshuffling of staff without knowledge of that Secretariat.

4. It was emphasized on all the Administrative Departments that FATA Secretariat should invariably be consulted before issuing orders of Posting/Transfer of Government Servants from and to FATA. However, FATA Secretariat have frequently conveyed their apprehensions that these instructions are not being followed, and at times a very embarrassing situation for the FATA Secretariat is created as work suffers due to shortage of staff which becomes a serious issue in prevailing law & order situation in FATA.

5. In view of above, it is reiterated that:-

- (i) All Provincial Government Departments are directed to move proposals for posting out of an employee from FATA only when a substitute is proposed in the same case.
- (ii) On consent from the FATA Secretariat and approval of the proposal by the competent authority, the substitute to FATA would invariably give his arrival for duty before the employee being transferred out of FATA is relieved.
- (iii) Provincial Government Departments may not accept the arrival report of an employee transferred out of FATA till his proper relieving order is issued by the FATA Secretariat.
- (iv) The A G (PR) is also requested that L.P.C of an employee transferred out of FATA but not relieved properly by FATA Secretariat may not be issued in any circumstances.
- (v) Instruction issued vide letter No.SO (E-1) E&AD /9-126/2006/Vol-II dated 26-01-2007 (quoted in Para-4 above) should be followed strictly.
- (vi) No NOC in respect of transfer from FATA to settled area issued by any Head of Line Department of FATA Secretariat should be accepted. Only those NOCs, which have been issued by the Administration & Coordination Department, FATA Secretariat, should be considered.
- (vii) Tenure of Civil Servants must be kept in view while issuing NOC for posting/transfer or considering postings/transfers.
- (viii) No NOC's should be issued in respect of employees in BS-1-15 who is from agency cadre and in whose respect Political Agent and Agency officer have been declared as appointing authorities.
- (ix) Persons appointed in agency cadre, if appointed in the settled areas will resign from service in FATA and will resume service in settled arrears as a fresh candidate.
- (x) NOCs may be issued in respect of employees of the Provincial cadres i.e. BS-16 and above only after completion of their normal tenure and they shall not be transferred out of FATA unless their substitutes are provided simultaneously. No. SOR-VI/E&AD/1-4/2008-Vol:VII Dt. : 30-3-2009

**Change in policy to fill vacant posts in FATA to ensure better human resource management**

The posting/transfer Policy of the Provincial Government in respect of candidates selected from Zone-I (FATA):-

- a) Every civil servant recruited against Zone-I by Public Service Commission shall directly report to FATA Secretariat. A copy of the joining report shall be submitted by the recruited officer to FATA Secretariat who shall endorse it to the concerned administrative department in the Provincial Government. The FATA Secretariat shall arrange medical and security clearance and thereafter submit a case through the respective administrative department seeking approval of the appointing authority. The appointment letter shall be issued by FATA Secretariat on behalf of the respective administrative department. Posting orders shall also be issued by FATA

endorsing copies to the respective Administrative department as well as to E&AD. This arrangement shall apply to recruitments made in BS-16 & above excluding PMS.

- b) In case of disciplinary action, against a civil servant deputed to FATA Secretariat by the Provincial Government, FATA Secretariat will carry out the preliminary inquiry, prepare charge sheet and Statement of allegations and submit case through Administrative Department concerned, for approval of the competent authority.
- c) Final orders in respect of disciplinary action will be issued by the Administrative Department concerned, copies whereof to be endorsed to FATA Secretariat as well as to E & AD.
- d) Leave A/Cs & GP Fund in respect of civil servants shall be maintained by FATA Secretariat by observing all codal formalities as in vogue in other Provincial Government Departments for such category of Government servants.
- e) FATA Secretariat will keep informed the concerned administrative departments for any action taken in respect of deputed civil servant. for record.  
(Authority: letter No.SOR-VI/E&AD/1-10/2010, dated 19-9-2012)

**Guidelines for transfer/posting of Naib Tehsildars/ Political Tehsildars/Assistant Political Agents.**

The powers /functions the Divisional commissioners in Khyber Pakhtunkhwa:-

- i. Monitoring and supervising of Revenue Administration
- ii. Posting/Transfer and and service matters/DPC etc of Naib Tehsildars, District Kanungos, District Revenue Accountants and Head Vernacular Clerk (HVC) in their respective Divisions.
- iii. Transfer of Tehsildars within their respective Divisional jurisdiction
- iv. The Board of Revenue shall exercise the powers to approve inter-Divisional transfers of Tehsildars/Naib Tehsildars after extending courtesy of consultation to the respective Divisional Commissioners.

Notifications bearing No.SO(O&M)E&AD/2-30 dated 12-10-2009,21-9-2010 & 29/7/2013 are hereby withdrawn

**Identification of Unattractive/Hard Areas policy**

- I. The distinction between unattractive/hard areas should be done away with and both should be labeled as Unattractive areas.
- II. The following areas approved to constitute unattractive areas in KP.
  - i. FATA areas ii) Kohistan District iii) Tank District iv) Chitral District v. Battagram District vi. Shangla District vii.Hang District viii.PATA areas of Mansehra (KalaDhaka)

**Miscellaneous:-** In case of married civil servants, transfer should be made at the beginning of the school session and tenure should be one year instead of 1.5 year, so that academic disruptions are avoided. At the time of entry in service, all civil servants be asked to give 4 options from unattractive areas. After a stint of service in unattractive area, employees may be offered option to service in district of choice. No SOR-VI/E&AD/1-4/2010-Vol-VIII dated 10-4-2010

Cadre) and serving against the posts of Management Cadre in BPS-19) since 2012-2013 while respondents No. 3 to 7 being juniors to them are going to be posted against the posts of petitioners as is evident from the Notification dated 31.05.2019; hence, the instant Writ Petition.

3. Respondents No. 1 & 2 have filed their comments and opposed the writ of petitioners.

4. Arguments heard and record perused.

5. Admittedly, petitioners belong to Teaching Cadre and have been posted against the post of Management Cadre as stopgap arrangement due to shortage of officers in Management Cadre, however, after filing Writ Petition No. 4274-P/2016 before this Court by Management Cadre, the same was disposed of vide order dated 11.01.2018 with direction to the respondents to finalize the case for making provision in the Rules with regard to promotions in the Management Cadre within three months with further direction to rationalize posting/transfer against Management Cadre posts in light of relevant rules/policy. In compliance thereof, the respondents have framed service rules for Management

- B. Incorrect and denied, the impugned Notification dated 20-03-2020 of the Respondent is within legal parameter and is liable to be maintained in the interest of equity of justice.
- C. Incorrect and denied. The statement of the appellant is against the facts and circumstances of the case as stated in the above mentioned paras of the instant reply as the appellant has been treated as per Law, Rules and Transfer and Posting policy of the Provincial Government.
- D. Incorrect and denied. The Appellant is basically an officer of BS-19 Principal post and cannot be adjusted against the DEO (M) Mansehra post of being a Management cadre post in the Respondent Department. The Honorable Tribunal held in Service Appeal No 1294\_/2018 titled as Faiza Shafi VS Govt of Khyber Pakhtunkhwa and Service Appeal No 1490/2019 titled as Neelofar Kamran VS Govt of Khyber Pakhtunkhwa that the Appellant may be given proper posting in her own cadre immediately and outstanding salaries should be paid within one month positively. **(Annex-D & E)**.
- E. That the prayer of the Appellant/ petitioner is directly relates to the terms and conditions of a civil servant falling under the ambit of Section 2(b) of KPK, Civil Servant Act 1973.
- F. Incorrect and denied, the impugned transfer Notification dated 20-03-2020 of Respondents is within legal sphere and is liable to be maintained.
- G. As already explained in the forgoing para.
- H. Incorrect and denied. The appellant is basically an officer of BS-19 Principal Post and cannot be adjusted against the DEO post of being a management case post in the Respondent Department.
- I. Incorrect and denied. The plea of the appellant regarding retirement is also baseless as on this plea the appellant wants to stick to the DEO post.
- J. Incorrect and denied, the impugned transfer Notification dated 20-03-2020 of the Respondents No.1 is within legal sphere and is liable to be maintained.
- K. That each and every civil servant falling under the ambit section-2 (b) of KPK, Civil Servant Act 1973 is legally bound to serve the Respondent Department to the entire satisfaction of the Competent Authority against the post for which he is being paid by the Respondent Department from the National exchequer.
- L. That the appellant is an employee of teaching cadre in BS-19 whereas the post of DEO (M) is of the Management cadre in the Respondent Department.
- M. As already explained in foregoing para.
- N. That in similar nature of Writ Petition No 3737/2019. The honorable Peshawar High Court Peshawar passed directions (to rationalize posting/transfer against the management cadre posts in light of relevant rules/policy. In compliance thereof, the respondents have framed service rules for management and notified the same for promotion up to BPS – 20 vide notification dated 27-03-2019, hence, keeping in

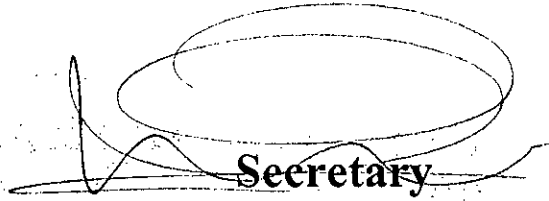
view the aforesaid service rules, the action of respondent for adjusting respondent No 03-07 (Management cadre Officers) against the petitioners post (Teaching cadre Officers) is in accordance with law and no Writ can be issued in favour of the Petitioners (Teaching Cadre).

- O. As already explained in the foregoing para.
- P. As already explained in the foregoing para.
- Q. As already explained in the foregoing para.
- R. As already explained in the foregoing para.
- S. As already explained in the foregoing para.
- T. That the appellant has not been discriminated. That Para-05 is correct that vide Notification dated 20/03/2020 the appellant posted against the Principal post in BS-19. As the Management cadre officers filed writ petition No. 4274-P/2016 before the Hon'able court, Peshawar which was disposed of in the following terms.

"According to the statement at bar of the Director Education and learned AAG, and process for making provision in the rules with regard to promotions in the Management Cadre is in the final stages, the writ petition is disposed of".

- U. Incorrect and denied. The Appellant is basically an officer of BS-19 Principal post and cannot be adjusted against the DEO (M) Mansehra post of being a Management cadre post in the Respondent Department. The Honourable Tribunal hold in Service Appeal No 1294 /2018 titled as Faiza Shafi VS Govt of Khyber Pakhtunkhwa and Service Appeal No 1490/2019 titled as Neelofar Kamran VS Govt of Khyber Pakhtunkhwa. That the Appellant may be given proper posting in her own cadre immediately and outstanding salaries should be paid within one month positively.

**In view of the above made submissions, it is, therefore, most humbly prayed that this Honourable Court may very graciously be pleased to dismiss the Service Appeal No. 4672 with cost in favour of the Respondents in the interest of justice.**

  
**Secretary**  
E&SE Department.  
(Respondents No.01&02)

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**JUDGMENT SHEET**  
**PESHAWAR HIGH COURT, PESHAWAR**  
**(JUDICIAL DEPARTMENT)**

WP No. 3737-P/2019

**JUDGMENT.**

Date of hearing: 22.10.2019

Petitioner: Nisar & Muhammad (Sps) - No. 6 Khelid Rehman *Deceased*

Respondents: Sps. No. Noor & Muhammad with wife - Deceased  
& - Sped. Officer Ali Shah ODG

**WAOAR AHMAD SETH, CJ:-** Petitioners, Nisar

Muhammad and others, through the instant Writ Petition, seek issuance of an appropriate writ declaring the decision of respondents to dislodge the petitioners from the posts occupied by them by adjusting respondents No. 3-7 thereagainst as without lawful authority and of no legal effect; hence, this Court may direct the respondents to act in the matter in accordance with law and not to disturb the petitioners by unlawful adjusting respondents No. 3-7 against the posts occupied by petitioners being senior regular officers in BPS-19.

2. In essence, grievance of the petitioners is that

they are Officers of the Elementary & Secondary Education

Department, Government of Khyber Pakhtunkhwa (Teaching